REMOVAL REPORT

FOR

BUFFALO COMPRESSOR STATION SITE
NE ¼, NE ¼, OF SECTION 1, TOWNSHIP 27 NORTH, RANGE 23 WEST
BUFFALO, HARPER COUNTY, OKLAHOMA

Prepared for

U.S. Environmental Protection Agency Region 6
Linda Carter, Project Officer
1445 Ross Avenue
Dallas, Texas 75202

Contract No. 68-W-01-005
Technical Direction Document No. 06-02-07-0003
WESTON Work Order No. 12632.001.040.0293
NRC No. N/A
CERCLIS No. OK0000605396
FPN No. N/A
EPA OSC Rita Engblom
START-2 FTL Patty Kulow

Prepared by

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167205

September 2002

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EXECUTIVE SUMMARY

The Buffalo Compressor Station Site (Buffalo Compressor) was identified for a time critical removal action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) in May 2002. The Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Number assigned to the site is OK0000605396. On 28 May 2002, the U.S. Environmental Protection Agency (EPA) submitted a General Notice of Potential Liability and Offer to Negotiate for Removal Action to Williams Gas Pipelines Central, Incorporated (WGPC). On 18 July 2002, EPA and WGPC entered into an Administrative Order on Consent for a Removal Action at the site to address polychlorinated biphenyls (PCB)-contaminated sources of the site. WGPC commenced the removal action on 20 August 2002 and demobilized from the site on 29 August 2002. The removal action included the removal of PCB-contaminated piping and drains lines, removal of PCB-contaminated soil, and site restoration. Appproximately 1,754 tons of PCB-contaminated soils and approximately 1,408 linear feet of piping were transported and disposed of at the Safety Kleen - Lone and Grassy Mountain facility in Waynoka, Oklahoma, approximately 80 miles southwest of the site. WGPC collected confirmation soil samples within the PCB-contaminated source area of the impoundment and the air receiving area. Analytical testing was conducted to confirm the removal of PCB-contaminated soil based on the requirements of the Toxic Substances Control Act (TSCA), *40 Code of Federal Regulations* (CFR) § 761.61(a)(7) and (a)(8). Confirmation soil samples were nondetect for PCB contamination, and the site was restored to its original grade. On 29 August 2002, WGPC and contractors completed field activities and demobilized the site.

☐	The EPA Task Monitor did not provide final approval of this report prior to the completion date of the work assignment. Therefore, Weston Solutions, Inc. has submitted this report absent the Task Monitor's approval.
X	The EPA Task Monitor has provided final approval of this report. Therefore, Weston Solutions, Inc. has submitted this report with the Task Monitor's approval.

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TABLE OF CONTENTS

Section **Page**

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LIST OF FIGURES

Title **Page**

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1. INTRODUCTION

The Superfund Technical Assessment and Response Team (START-2) was tasked by the U.S. Environmental Protection Agency (EPA) Region 6 Response and Prevention Branch (RPB) under Contract Number 68-W-01-005 and Technical Direction Document (TDD) No. 06-02-07-0003 (Appendix H) to perform potentially responsible party (PRP) oversight during the removal activities at the Buffalo Compressor Station (Buffalo Compressor) site. On 21 August 2002, START-2 began the removal oversight of Buffalo Compressor. START-2 has prepared this Removal Report to describe the technical scope of work that was completed. The Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Number assigned to the site is OK0000605396.

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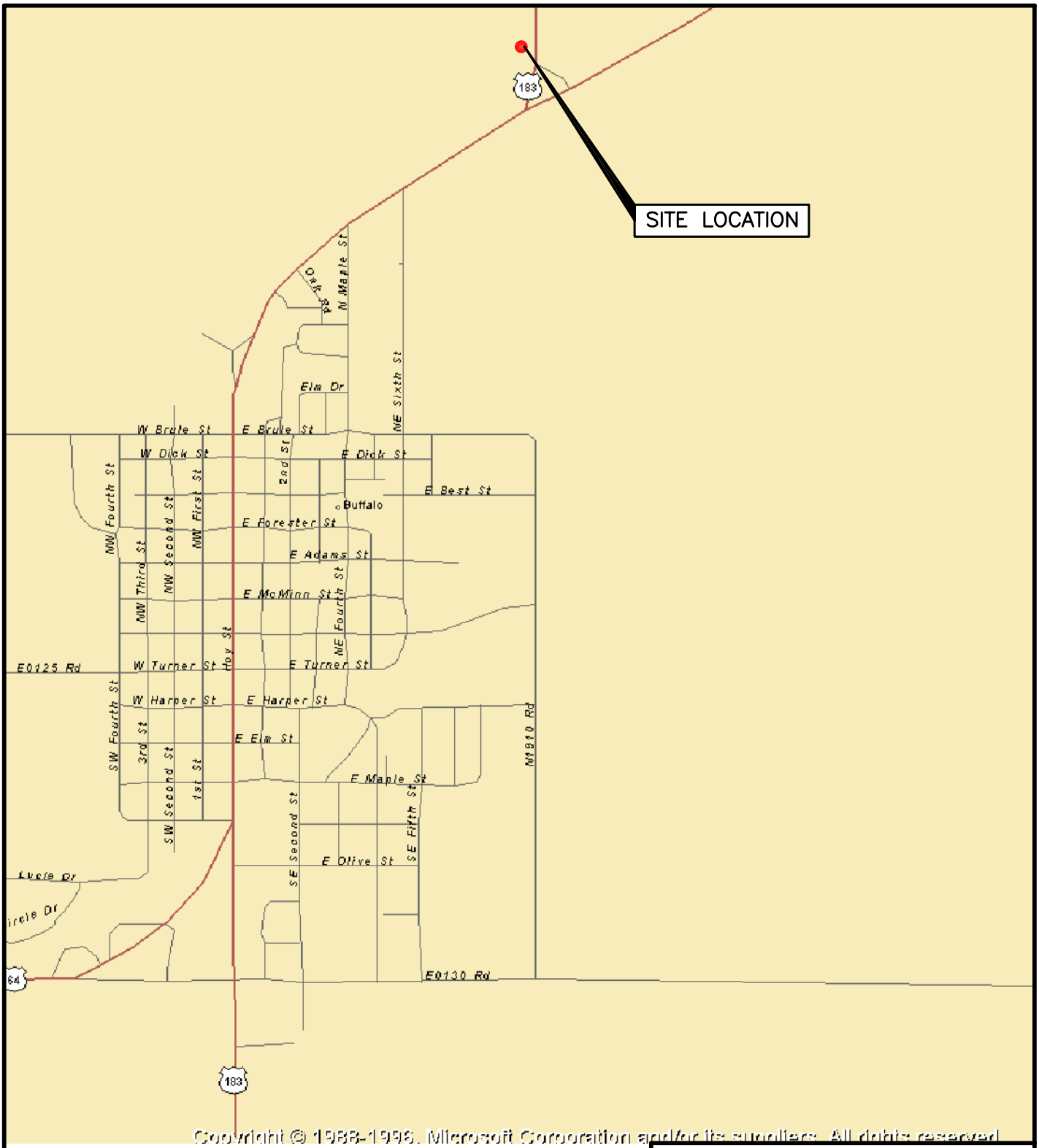

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OKLAHOMA

N

US EPA REGION 6
START-2

FIGURE 1-1
SITE LOCATION MAP
BUFFALO COMPRESSOR STATION SITE
BUFFALO, HARPER COUNTY, OKLAHOMA

DATE:	W.O. #	SCALE:
09-25-02	12632.001.040.0293	NOT TO SCALE

TDD No.: 06-02-07-0003
CERCLIS NO.: OK0000605396

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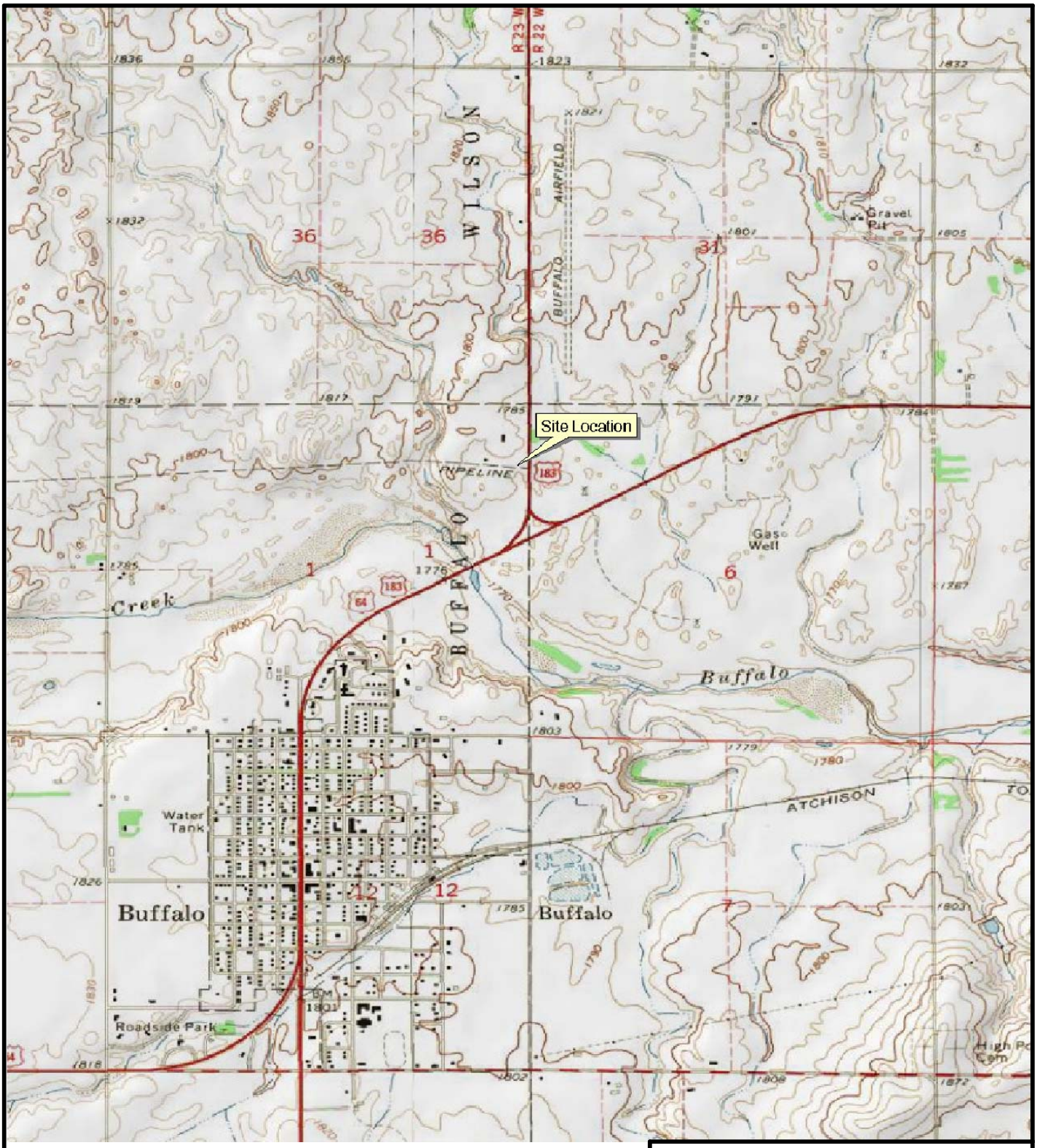

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SOURCE: U.S.G.S. 7.5 MINUTE SERIES TOPOGRAPHIC MAP
BUFFALO SE, OKLAHOMA (1975)
TDD No.: 06-02-07-0003
CERCLIS NO.: OK0000605396

US EPA REGION 6
START-2

FIGURE 1-2
SITE AREA MAP
BUFFALO COMPRESSOR STATION SITE
BUFFALO, HARPER COUNTY, OKLAHOMA

DATE:	W.O. #	SCALE:
09-25-02	12632.001.040.0293	NOT TO SCALE

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2. PURPOSE AND SCOPE

The purpose of the removal action at the Buffalo Compressor site was to remove polychlorinated biphenyl (PCB)-contaminated underground air and drain lines to the impoundment and to remove PCB-contaminated soils from the impoundment and air receiver areas in order to meet the requirements set forth in the Toxic Substances Control Act (TSCA), *40 Code of Federal Regulations* (CFR) § 761.61(a)(7) and (a)(8).

The scope of work defined in the TDD included documentation and oversight of PRP removal activities. START-2 was tasked to maintain the site logbook; to monitor containment and cleanup action; to prepare pollution reports (POLREPs); to prepare a health and safety plan (HASP); to prepare site sketch and site map; to provide print and digital photographic documentation; and to compile and review background data.

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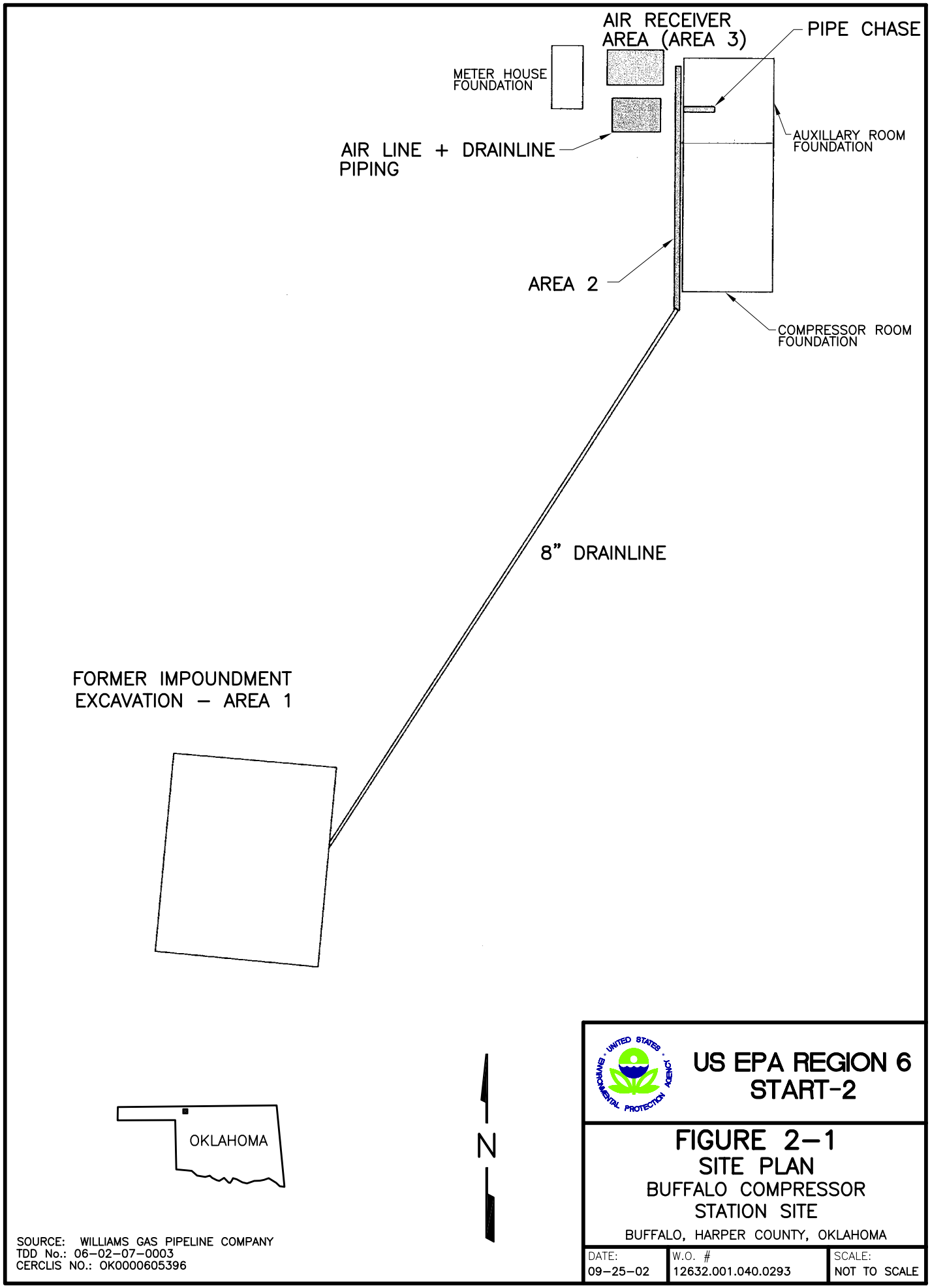

SOURCE: WILLIAMS GAS PIPELINE COMPANY
TDD No.: 06-02-07-0003
CERCLIS NO.: OK0000605396

US EPA REGION 6
START-2

FIGURE 2-1
SITE PLAN
BUFFALO COMPRESSOR STATION SITE
BUFFALO, HARPER COUNTY, OKLAHOMA

DATE:	W.O. #	SCALE:
09-25-02	12632.001.040.0293	NOT TO SCALE

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3. SITE BACKGROUND

Information regarding site location, background information, and site description is presented in the following subsections.

3.1 SITE LOCATION

The Buffalo Compressor site is located approximately ¼ mile north of the intersection of Oklahoma Highways 64 and 183, northeast of the city of Buffalo, Oklahoma. The property is located within the NE ¼, NE ¼ Section 1, Township 27 North, Range 23 West. The site is located on approximately 18 acres of open pastureland. Neighboring properties are primarily used for agricultural purposes. The nearest navigable waterway to the site is a tributary of Buffalo Creek, which is located approximately ¼ mile east of the site.

3.2 BACKGROUND INFORMATION

Before the early 1970s, the Buffalo Compressor site served as a transfer point in the WGPC high-pressure natural gas pipeline transmission and distribution system to maintain necessary gas pressures. During the operational years of the site, PCBs were used in lubricants and cooling fluids at the compressor station. PCB-contaminated lubricants may have migrated from the air compressor units to the air dryers and air receiver tanks as PCB-contaminated condensates.

According to WGPC personnel, the Buffalo Compressor site had not been in operation since the early 1970s. During the 1980s, the aboveground site structures such as buildings and equipment were removed from the site. The site formally consisted of building foundations and concrete pads from the former engine room and auxiliary building, the engine room basement, and the fin fans area. The site also consisted of piping in the former air receiver area. An approximate 80-foot by 80-foot earthen impoundment was constructed southwest of the compressor station when the site was in operation and later backfilled with soil. Figure 2-1 presents the former site layout and work areas.

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Based on sampling from other WGPC compressor stations that utilized Pydraul AC compressor oil, as did the Buffalo Compressor site, WGPC evaluated the presence of PCBs at the Buffalo Compressor site. During April 1994 through March 2002, WGPC conducted multiple site screening investigations through the collection of wipe and soil samples at the site to determine whether PCB-contaminated lubricants had been released or posed a threat of release into the environment. Details of previous WGPC site investigations are provided in Appendix A. As a result of the WGPC investigations, four potential areas were identified as containing PCB contamination. The areas of concern include the impoundment area (approximately 1,215 cubic yards of PCB-contaminated soil), air lines (approximately 200 feet of underground piping associated with the air system), drain lines (approximately 400 feet of piping associated with discharge to the impoundment), and the air receiver area (approximately 30 cubic yards of PCB-contaminated soil). In 1995, WGPC performed concrete cleaning and removed PCB-contaminated piping located inside the auxiliary building. Verification wipe samples were collected to ensure target areas were cleaned to below the PCB cleanup level for nonporous surfaces in high-occupancy areas, 10 micrograms per 100 square centimeters (10 ug/100 cm^2). Approximately 3,000 square feet of concrete were chemically cleaned of PCBs.

On 20 May 2002, EPA signed an Action Memorandum requesting a time critical removal action at the Buffalo Compressor site (Appendix B). On 28 May 2002, EPA submitted a General Notice of Potential Liability and Offer to Negotiate for Removal Action to WGPC (Appendix C). On 18 July 2002, EPA and WGPC entered into an Administrative Order on Consent for a Removal Action at the site to address the PCB-contaminated sources of the site. EPA established an Administrative Record that contains documents that form the basis of the EPA decision on the selection of a response action for a site. The Administrative Record files for the WGPC Buffalo Compressor removal action are available to the public for inspection and comment at the EPA Regional Office in Dallas, Texas. A copy of the Administrative Record index is provided in Appendix D.

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3.3 SITE DESCRIPTION

The Buffalo Compressor site is currently owned by Williams Gas Pipelines Central, Inc., f/k/a Williams Natural Gas Company (WGPC), and is located approximately one mile northeast of Buffalo, Harper County, Oklahoma. Figure 1-1 presents the Site Location Map. WGPC is the responsible party. The site is not in service and at the time of the initiation of the removal, the site consisted of building foundations and concrete pads from the former engine room and auxiliary building, the engine room basement, and the fin fans area. The site also consisted of piping in the former air receiver area. The site is located on approximately 18 acres of open pastureland. Neighboring properties are primarily used for agricultural purposes. The nearest navigable waterway to the site is a tributary of Buffalo Creek, which is located approximately ¼ mile east of the site. Figure 1-2 presents the Site Area Map. The geographic center of the site is Latitude 36.85328º North and Longitude 99.62039º West, as determined from the U.S. Geological Survey (USGS) Buffalo SE Quadrangle, 7.5-minute series topographic map. The map scale is 1:24,000 and is in the National Geodetic Vertical Datum of 1975.

Based on information obtained from WGPC (Appendix A), the PCB-contaminated sources of the site included the impoundment, drain line and air line piping, and air receiver area.

The Buffalo Compressor site consisted of an engine room, auxiliary building, engine room basement, air receiver area, fin fan area, and impoundment. The air compressor system for the Buffalo Compressor site began in the auxiliary building. Compressed air was produced, dried in an air dryer, and passed through air lines to the air receiver storage tanks. Due to changes in temperature and pressure, condensate accumulated in the air dryer and air receiver storage tanks. Condensate from the air dryer and air receiver tanks was directed to a drain line that fed into an underground drainage system, which led to the impoundment.

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4. ACTIONS TAKEN

On 20 August 2002, WGPC and their contractors mobilized on-site and commenced removal activities at the Buffalo Compressor site. The PRP-removal contractors involved at the site were Diamond Services (exposed underground piping and excavated PCB-contaminated soils), MP Environmental (transported PCB-contaminated soils), and Atkins Benham Group (collected confirmation samples and documented on-site field activities). On 21 August 2002, START-2 provided written documentation of on-site activities in a field logbook (Appendix G). Digital photographs are included in Appendix F. On 22 August 2002, START-2 continued removal oversight of WGPC site activities by telephone. Pollution reports (POLREPs) were drafted by START-2 and summarized the daily progress of the activities conducted at the Buffalo Compressor site (Appendix E).

From 20 through 23 August 2002, WGPC identified and exposed drain and air lines, established grid nodes using a surveying instrument in the impoundment area, and transported PCB-contaminated pipelines and soils for disposal. WGPC utilized a portable gas chromatography (GC) instrument to screen excavated soils in the impoundment for PCBs. WGPC collected soil samples for confirmation purposes and submitted the field samples to Environmental Science Corp., in Nashville, Tennessee, for PCB analysis. The results of the confirmation soil samples collected at the impoundment and air receiving areas were nondetect for PCB contamination. WGPC graded the site with imported fill material until the area was restored to its natural elevation. On 29 August 2002, WGPC and contractors completed field activities and demobilized from the site.

WGPC submitted a final report for the WGPC removal action and analytical results to the EPA. A copy of the WGPC final report can be found in the EPA Regional Office in Dallas, Texas.

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5. LIST OF APPENDICES

Appendix A WGPC Buffalo Compressor Station Final Report (EPA File Only)

Appendix B EPA Action Memorandum/Enforcement

Appendix C General Notice of Potential Liability and Offer to Negotiate for Removal Action

Appendix D EPA Administrative Record (EPA File Only)

Appendix E Pollution Report (POLREP)

Appendix F Digital Photographs

Appendix G Copy of START-2 Logbook

Appendix H Copy of START-2 TDD 06-02-07-0003

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Appendix A

WGPC Buffalo Compressor Station Final Report (EPA File Only)

Appendix B

EPA Action Memorandum/Enforcement

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

COPY

ACTION MEMORANDUM/ENFORCEMENT

SUBJECT: Request for a Time Critical Removal Action at the Buffalo Compressor Station Site, Harper County, Oklahoma

FROM: Rita Engblom, Federal On-Scene Coordinator
Superfund Division (6SF-R1)

THRU: Charles A. Gazda, P.E., Chief
Response and Prevention Branch (6SF-R)

TO: Myron O. Knudson, P.E., Director
Superfund Division (6SF)

I. PURPOSE

This Memorandum requests approval of a Time Critical removal action in accordance with the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604, at the Buffalo Compressor Station site located one mile northeast of the city of Buffalo, in Harper County, Oklahoma. The facility encompasses 18 acres. The removal action is to address polychlorinated biphenyls ("PCBs") contamination in soil and on drain/air lines at the site.

This action meets the criteria for initiating a removal action under Section 300.415 of the National Contingency Plan ("NCP"), 40 CFR § 300.415. This action is expected to require less than twelve months and $2 million to complete.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID#: OK0000605396
Category of Removal: Time-Critical
Site ID#: MN
National Significance: Removal Action

A. Site Description

1. Removal Site Evaluation

Williams Gas Pipelines Central, Inc., f/k/a Williams Natural Gas Company ("WGPC") operates a high-pressure natural gas pipeline transmission and distribution system in several southern and Midwestern states. Compressor stations, such as the Buffalo Compressor Station site are located at various points along the pipeline to maintain necessary gas pressures.

Due to the heat resistant and fire retardant characteristics of PCBs, they were used in lubricants and cooling fluids at these compressor stations. The Buffalo Station was in service from the mid 1960s to the early 1970s. The WGPC began investigating the Buffalo Station site in 1994 to determine whether PCB-contaminated lubricants had been released to the environment or provided a threat of release to the environment.

2. Physical Location

The Buffalo Compressor Station site is located approximately one mile northeast of Buffalo, Oklahoma, and is an 18-acre facility. The property is located in the NE $^1/_4$ of Section 1, Township 27 North, Range 23 West (*See* Attachment 1). The site is located in an area that is rural and primarily used for agricultural purposes.

There is one residence immediately north of the site. The population of Buffalo, one mile northeast of the site, is approximately 1,620. Currently, the site could be classified as a low occupancy area in accordance with 40 CFR § 761.3. However, the future land use of this site is unknown and for purposes of this removal action, the site is classified as a high occupancy area.

Topography is nearly level to gently sloping plains. Surface water runoff is to an intermittent stream located approximately $^1/_8$ of a mile east of the site, and to a tributary to Buffalo Creeks located approximately $^1/_4$ of a mile west of the site.

3. Site Characteristics

According to WGPC, the Buffalo Compressor Station site has not been operational since the early 1970s. During the 1980s, the above ground site structures (e.g. buildings, equipment) were removed. The site currently consists of building foundations and concrete pads from the former engine room and auxiliary building, the engine room basement, piping in the former air receiver area, and the fin fans area. Additionally, on the western half of the site, there is an impoundment approximately 80 feet by 80 feet in size that was backfilled with soil when the site was operational (*See* Attachment 2).

In April 1994, WGPC investigated the site to determine whether PCBs had migrated from the air compressor units to the air line header, the engine room basement, or soil in the former air receiver area, the former air discharge area, the former prelube air pipe area, and the backfilled impoundment. The results of this investigation revealed a PCBs concentration of 38 mg/kg in one sample collected from the former air receiver area. Four other samples contained PCBs concentrations ranging from 9.4 to 21.0 mg/kg.

In 1995, WGPC collected wipe samples to evaluate the presence of PCBs on metallic and concrete surfaces including concrete floors and pipe chases. Of the 48 wipe samples submitted for laboratory analysis, nine contained PCBs concentrations exceeding 10 $\mu g/100\ cm^2$: one from the floor of the auxiliary area, seven from auxiliary area pipe chases, and one from a pipe to the air receivers. The WGPC also removed the water (which did not contain PCBs) as well as the sludge and oil that had collected in the engine room basement. Oil and sludge samples were collected and analytical results revealed no PCBs concentration exceeding 1.0 mg/kg.

In 2000, WGPC performed additional soil and wipe sampling. Soil samples were collected from the former impoundment and also from the air receiver discharge area. Soil samples collected from the impoundment were analyzed for PCBs, RCRA metals, and SVOCs; soil samples collected from the air receiver discharge area were analyzed for PCBs. Analytical results indicated that two of the grids in the impoundment had PCBs concentrations exceeding 10 mg/kg. One sample documented PCBs at 25.3 mg/kg and one sampled detected PCBs at 15.7 mg/kg. RCRA metal and SVOC concentrations detected in the impoundment did not exceed regulatory criteria.

Sixteen wipe samples were collected from the air lines, drain lines, and a concrete floor drain (located in the auxiliary area) that had not previously been sampled. Seven of the 16 wipe samples collected contained surface concentrations of PCBs greater than 10 $\mu g/100\ cm^2$.

In March 2002, four additional grids from the impoundment were sampled. The 0"-72" intervals sampled in these grids had PCBs concentrations greater than 1 mg/kg, prompting analysis at greater depths. Analytical results of the (72"-78") interval, indicated that four grids had PCBs concentrations of: 2.0 mg/kg, 1.0 mg/kg, 6.4 mg/kg, and 1.0 mg/kg. At the (84"-90") interval, four grids had PCBs concentrations of: 3.4 mg/kg, 1.3 mg/kg, 1.8 mg/kg, 1.3 mg/kg. At the (96"-102") interval, two grids had PCBs concentrations of: 1.4 mg/kg, and 0.72 mg/kg.

A summary of these investigations indicates four potential areas to be addressed by this removal action. The areas of concern include:

- Impoundment Area - Approximately 1,215 cubic yards of PCBs contaminated soil;
- Air Lines - Approximately 200 linear feet of underground air line piping associated with the air system;
- Drain Lines - Approximately 400 feet of drain line is associated with discharge to the impoundment; and,
- Air Receiver Area - Approximately 30 cubic yards of PCBs contaminated soil.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

PCBs have been detected in soils and on air and drain lines at the site. PCBs are listed as hazardous substances pursuant to 40 CFR §302.4. As such, they are "hazardous substances" as defined in Section 101(14) of the CERCLA, 42 U.S.C. §9601(14).

5. NPL Status

This site is not on and is not proposed for listing on the National Priorities List.

6. Maps, pictures and other graphic representations

Attachment 1 Site Location Map
Attachment 2 Site Map
Attachment 3 Enforcement Addendum

B. Other Actions to Date

1. Previous Actions

In 1995, WGPC performed concrete cleaning and removal of piping inside the building where the previous investigations had detected elevated concentrations of PCBs. Wipe samples were collected to verify the attainment of cleanup criteria. Any location where the verification sample exceeded 10 µg/100 cm^2 of PCBs was cleaned and resampled until all target areas were below 10 µg/100 cm^2 of PCBs. Approximately 3,000 square feet of concrete were chemically cleaned of PCBs.

2. Current Actions

No response actions are currently underway at the site.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

There have been no state or local actions taken to date.

2. Potential for State/local Response

The Oklahoma Department of Environmental Quality will provide assistance in oversight of this removal action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a removal action. Paragraphs (b)(2)(i), (ii), (v), and (iv) directly applied to the conditions at the Site. Any one of these factors may be sufficient to justify a removal action.

1. Exposure to Human Populations, Animals or the Food Chain, NCP Section 300.415.(b)(2)(i)

There is potential for exposure of human populations and animals to PCBs which is a hazardous substance substance as defined in CERCLA Section 101(14), 42 U.S.C. 9601(14), and further defined at 40 CFR §302.4. Release of these contaminants has been identified through site assessment, and there is a threat of further release. People and animals coming on to the site could be exposed to these contaminants through ingestion, skin contact and inhalation pathways.

PCBs are toxic chemicals which are extremely stable and persistent in the environment. PCBs are toxic to humans, causing liver damage, adverse skin effects, and changes in other biological functions, and are regarded by the EPA as probable human carcinogens. PCBs bioaccumulate in humans and other organisms, which means that PCBs accumulate over time in living tissues in concentrations much higher than the concentrations to which the organisms are exposed in the environment.

Routes of human exposure of PCBs include inhalation of PCB-contaminated dust, direct contact with and ingestion of PCB-contaminated dust, direct contact with and ingestion of PCB-contaminated soil, and ingestion of fruits, vegetables or animals contaminated by exposure to PCB-contaminated soil. In addition, PCBs may be volatilized into the air and subsequently inhaled by humans.

PCBs have the potential to bioaccumulate in the food chain due to the lipophilic nature of the compound. For acute exposures, The Agency for Toxic Substances and Disease Registry ("ATSDR") reports liver damage effects in animals at ingestion dosages of approximately 0.4 to 0.8 mg/kg/day. The ATSDR also reports adverse effects on unborn animals at ingestion dosages of approximately 3 to 13 mg/kg/day and death in animals at ingestion dosages of approximately 750 mg/kg/day for acute exposures. ATSDR also reports death in animals at skin contact dosages of approximately 1250 mg/kg/day.

For chronic exposures (greater than 14 days), ATSDR reports effects on unborn and newborn animals at ingestion dosages of approximately 0.005 to 0.1 mg/kg/day; liver and skin damage and death are reported at ingestion dosages of approximately 0.1 mg/kg/day or greater. ATSDR also reports, liver and kidney damage in animals at skin contact dosages of approximately 100 mg/kg/day.

The levels of PCBs found during the site investigation exceed the levels identified above as presenting potential health problems in human populations. Nearby residents or on-site workers are subject to adverse exposure to these contaminants by inhalation of airborne particulate containing one or more of the contaminants, by direct contact and by ingestion of dusts and soils. Also, there is an increased threat to human health, animals and the food chain from the migration of contaminants subject to entrainment, windblown deposition and surface runoff.

The lack of restricted access to the property and the proximity of residents to the contaminated areas on site increases the potential for exposure to human populations.

2. Contamination of Drinking Water Supplies or Sensitive Ecosystems, NCP Section 300.415(b)(2)(ii)

The Buffalo Compressor Station is located in Harper County which is in the land area underlain by the High Plains aquifer. The High Plains area is a major agricultural area, supported primarily by water from the High Plains aquifer, which is used to irrigate wheat and corn and to raise cattle and swine. The High Plains aquifer underlies about 174,000 square miles in parts of eight states, including about 7,100 square miles in northwestern Oklahoma which includes Beaver, Cimarron, Dewey, Ellis, Harper, Texas, and Woodward Counties. The High Plains aquifer is composed of clay, silt, sand and gravel, with the sand and gravel layers contributing most of the water to wells. Depth to water in the High Plains of Oklahoma ranges from less than 10 feet to more than 300 feet below the land surface.

Properties in the vicinity of the site are generally rural and agricultural in nature. The nearest surface water to the site is an intermittent stream located one-eighth mile east of the site, and a tributary to Buffalo Creek located approximately one-quarter mile west of the site. Based on surface topography, ground water flow appears to be generally to the southeast. However, ground water flow direction can be influenced locally and regionally by subsurface topography, recharge and discharge areas; horizontal/vertical inconsistencies in the types and locations of subsurface soil and bedrock; and proximity to water pumping wells.

3. Contaminants in Soils, NCP Section 300.415.(b)(2)(iv)

PCBs are hazardous substances as defined in CERCLA Section 101(14), 42 U.S.C. § 9601(14), and further defined at 40 CFR §302.4. Sample results indicated that PCBs contamination exceeded 25 mg/kg in one soil sample collected from the former air receiver area with 38 mg/kg. Four additional soil samples contained PCBs concentrations between 9.4 and 21.0 mg/kg.

4. Weather Conditions That May Cause the Release or Migration of Hazardous Substances, NCP Section 300.415(b)(2)(v)

The area receives an average of 29 inches of rain annually and 16 inches of snow. The contaminants are subject to migration by entrainment, windblown deposition and surface runoff.

B. Threats to the Environment

The levels of PCBs in soils at this site present a potential health problem to animal life that comes into contact with contaminated soil and to freshwater aquatic life that receives runoff from this site.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

In accordance with Toxic Substances Control Act ("TSCA"), 40 CFR § 761.61(a)(4) the clean-up level for soil in a high occupancy area is to less than 1 ppm in soil or to less than 10 ppm with a cap meeting the requirements of 40 CFR § 761.61(a)(7) and (a)(8). In accordance with 40 CFR § 761.61(a)(4)(ii) the clean-up level for non-porous surfaces in high occupancy areas, the surface PCBs cleanup standard is 10 µg/100cm^2 of surface area.

- Underground Air Lines/Drain Line to Impoundment:

Approximately 600 feet of PCBs contaminated piping (air and drain lines) that tested above 10 µg/100cm^2 of PCBs will be removed for off-site disposal. Removal of lines will begin with excavation of a 2- to 4-foot trench to expose the pipe along the length to be removed. Prior to and following removal, the lines will be inspected for evidence of holes, breaks, or leaks.

If a defect is found in the line, one soil sample of PCBs analysis will be collected below the center point of each identified defect. If no defects are found, no sampling will be performed. If PCBs contamination is detected, the soil will be excavated to achieve a PCBs concentration of less than 1 mg/kg of PCBs or less than 10 mg/kg of PCBs with a cap. If analysis of PCBs at the location of a defect is above 1 mg/kg, an area 10-feet by 2-feet, centered on the contaminated sample location, will be excavated to a depth of 10

inches (approximately 17 ft^3). Samples will be collected from the corners and center of the excavated grid and analyzed of PCBs. If any sample analyses documents PCBs concentrations greater than 1 mg/kg, another 10" from a 10-foot by 2-foot area will be excavated or the area may be capped, if concentrations in the soil are less than 10 mg/kg of PCBs.

Once the integrity of a line has been determined and any contaminated soils identified and removed, the line will be checked for liquids and explosive atmospheres. If liquids are present, a vacuum will be used to collect liquids for off-site disposal. Liquids from these lines are expected to have concentrations of PCBs less than 50 ppm, and are classified as incidental sources of PCBs that may be sent to an off-site landfill with excavated soils from the site.

Once lines are cleared they will be cut into appropriately sized sections for direct disposal. A containment structure will be constructed under each immediate cutting zone to prevent the accidental release of PCBs to the soil.

In addition to removing the air lines and drain line previously identified to exceed 10 $\mu g/100cm^2$ of PCBs, the lateral extent of surface PCBs contamination from the main drain/air lines will be investigated as taps are discovered. Additional, wipe samples will be collected from lateral lines to trace and remove additional piping that tests above 10 $\mu g/100cm^2$ of PCBs. If these lines are determined to be in low occupancy areas (dependent on depth) they may remain in place, in accordance with 40 CFR 761.61(a)(4)(ii) if the surface area is below 100 $\mu g/100cm^2$ of PCBs.

- Impoundment:

Soil that exceeds 1 mg/kg of PCBs will be excavated to a maximum depth of 20 feet. If soils remain above 1 mg/kg of PCBs but less than 10 mg/kg a cap will be constructed over the contaminated area. Approximately1,215 cubic yards of soil will be removed from the impoundment area for proper treatment and disposal based upon a clean-up level of 1 mg/kg of PCBs. If a clean-up level of 10 mg/kg of PCBs is applied, approximately 831 cubic yards of soil will be removed.

- Air Compressor Area

Soil will be excavated from the air compressor area to a depth of two feet, resulting in a removed volume of approximately 30 cubic yards.

Final soil verification sampling will be conducted after the field sampling and analysis indicate clean-up levels have been achieved at all locations where soil has been excavated for off-site disposal.

PCB-containing excavated soils will be loaded into lined transfer boxes, front-end loader, dump truck, or other equivalent conveyance equipment and staged. Stockpiles will be lined and bermed to prevent the migration of PCBs to clean soil. In addition, soil may be loaded directly onto trucks at each excavation area in lieu of staging.

All excavation areas will be backfilled, graded to previous contours, capped (if soils remain with PCBs concentrations that are greater than 1 mg/kg) and covered with at least 10 inches of clean topsoil. General measures for erosion control will be implemented, including the placement of silt fences, where appropriate, and seeding.

All off-site transportation and disposal will be done in accordance with applicable U.S. Department of Transportation ("USDOT") requirements and in compliance with the EPA's Off-Site Rule. All requirements under the Occupational Safety and Health Act ("OSHA") of 1970, 29 U.S.C. § 651 et seq., and under the laws of the State, approved under Section 18 of the Federal OSHA laws, as well as other applicable safety and health requirements, will be followed. Federal OSHA requirements include Hazardous Materials Operation, 20 CFR § 1910, as amended by 54 Fed. Reg. 9317 (March, 1989), all OSHA General Industry (29 CFR § 1910) and Construction (29 CFR § 1926) standards wherever they are applicable, as well as OSHA record keeping and reporting regulations, and the EPA regulations set forth in 40 CFR § 300, relating to the conduct of work at Superfund sites.

Other requirements under the OSHA of 1970, 29 U.S.C. § 651 et seq., and under the laws of a State with an approved equivalent worker safety program, as well as other applicable safety and health requirements, will be followed. Federal OSHA requirements include, among other things, Hazardous Materials Operation, 20 CFR § 1910, as amended by 54 Fed. Reg. 9317 (March 1989), all OSHA General Industry (29 CFR § 1910) and Construction (29 CFR § 1926) standards wherever they are relevant, as well as OSHA record keeping and reporting regulations, and the EPA regulations set forth in 40 CFR § 300 relating to the conduct of work at Superfund sites.

2. Contribution to Remedial Performance

Because this action constitutes source control, these actions are cost effective and consistent with any long term remediation strategies that may be developed for the site.

3. Description of Alternative Technologies

EPA considered using alternate treatment technologies rather than excavation to achieve the soil cleanup levels specified in Section V.A.1., above. The EPA's policy regarding the use of alternative technologies for removal actions, as described in the Office of Solid Waste and Emergency Response Directive 9380.2-1 "Administrative Guidance for Removal Program Use of Alternatives to Land Disposal," is that the alternative technology must provide for timely response

and protection of human health and the environment. The policy also establishes three criteria to consider in considering use of alternative technologies: effectiveness, implementability, and cost.

Thermal destruction is identified in the Superfund Technology Screening Guide for Treatment of CERCLA Soils and Sludges (EPA/540/2-88/004) as the only demonstrated effective treatment technology of PCBs. Other potentially effective technologies include dechlorination, bioremediation, chemical extraction, soil washing, and solidification/ stabilization.

Soil washing and solidification/stabilization were not considered viable treatment options as both are considered only potentially effective for PCBs remediation and further research would compromise the removal objective of timely response. The treatment alternatives of thermal desorption, solvent extraction or dechlorination would likely result in a project length of 6-12 months (or more), due to treatability testing. In addition, thermal desorption, solvent extraction or dechlorination are estimated to add significant costs to the project, relative to excavation and landfilling, with little or no anticipated risk reduction than would be achieved by excavation and landfilling. Incineration is timely, protective of human health and the environment, effective and implementable. However, this technology is estimated to cost an average of four to six times that of excavation and off-site landfilling, with little or no anticipated risk reduction over what would be achieved by excavation and landfilling.

4. Applicable or Relevant and Appropriate Requirements ("ARARs")

This removal action will be conducted to abate the actual or potential release of a hazardous substance, pollutant, or contaminant to the environment, in accordance with CERCLA, 42 U.S.C. § 9601 et seq., and in a manner consistent with the National Contingency Plan, 40 CFR § 300, as required at 33 U.S.C. § 1321(c)(3) and 42 U.S.C. § 9604 (a)(1). As stated at 40 CFR § 300.415(j), fund-financed removal actions under CERCLA Section 104 and removal actions under CERCLA Section 106 shall, to the extent practicable considering the exigencies of the situation, attain the ARARs under Federal environmental law.

ARARs are set forth in the TSCA codified at 40 CFR § 700 for the disposal, cleanup and verification sampling of PCBs spills.

The RCRA waste analysis requirements found at 40 CFR §§ 261.20 and 261.30, RCRA manifesting requirements found at 40 CFR § 262.20, and RCRA packaging and labeling requirements found at 40 CFR § 262.30 are ARARs for this removal action. Because on-site storage of hazardous wastes will not exceed ninety days, specific storage requirements found at 40 CFR § 265 are not ARARs. *See* 40 CFR § 262.34.

5. Project Schedule

After the Action Memorandum is signed, it is anticipated that the initial excavation and cleanup action will commence within 60 days. On-site excavation will take approximately 15 days. Total project length will be approximately 15-30 days.

B. Estimated Costs

This action is expected to be performed by WGPC. The estimated cost of oversight of this action is approximately $ 21,500.

ESTIMATED COSTS

Extramural Costs

ERRS	**$ N/A**
START	**$ 14,000.00**
Subtotal, Extramural Costs	**$ 14,000.00**
TOTAL, EXTRAMURAL COSTS	**$ 14,000.00**

Intramural Costs

EPA Regional Direct Costs	**$ 5,000.00**
EPA Regional Indirect Costs	**$ 2,000.00**
EPA Headquarters Costs	**$ N/A**
TOTAL, INTRAMURAL COSTS	**$ 7,000.00**
Subtotal, Intramural and Extramural	**$ 21,000.00**
Contingency	**$ 500.00**
TOTAL, CERCLA REMOVAL PROJECT CEILING..	**$ 21,500.00**

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

The proposed actions for the Buffalo Compressor Station site should be taken immediately. Should these actions be delayed, the potential threats to human health and the environment will increase. A substantial amount of the PCBs contamination is in an unrestricted access area, with a rural population nearby.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

See attached confidential Enforcement Attachment (Attachment 3).

IX. RECOMMENDATION

This decision document represents the selected removal action for the Buffalo Compressor Station Site, in Buffalo, Oklahoma, developed in accordance with CERCLA, 42 U.S.C.§ 9601 et seq., and consistent with the NCP, 40 CFR § 300. This decision is based on the administrative record for the Site.

Conditions at the site meet the NCP section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be $21,500.00. None of this funding will come from the Regional removal allowance.

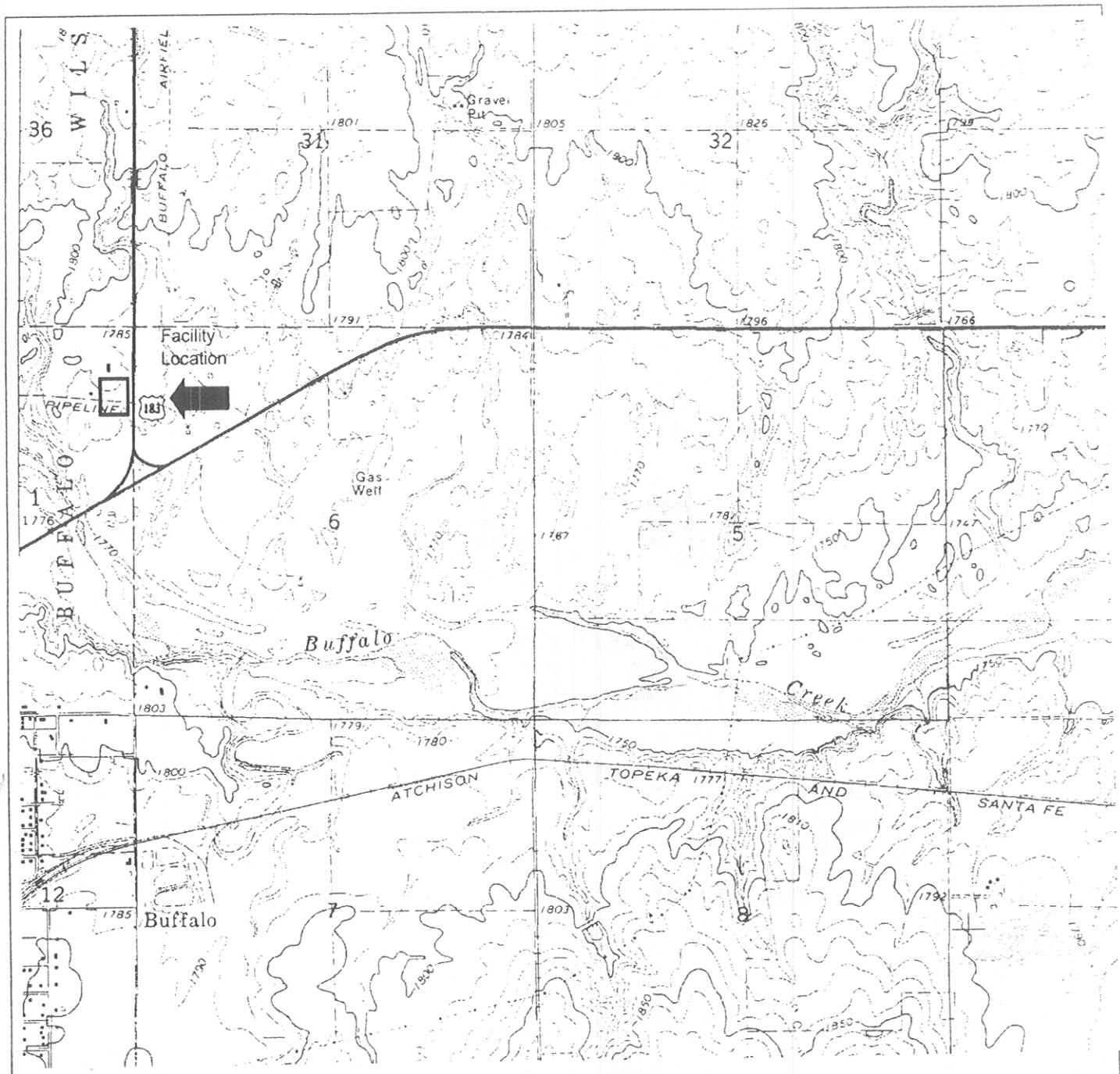
Approved:

Myron O. Knudson

Myron O. Knudson, P.E., Director
Superfund Division

5/20/02
Date

Attachments



U.S.G.S. 7.5 MINUTE SERIES TOPOGRAPHIC MAP

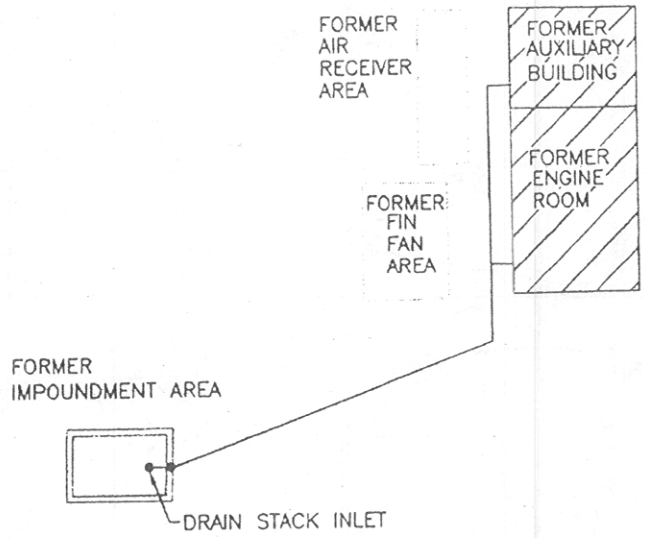
STATE of OKLAHOMA QUADRANGLE

BUFFALO SE

1975

Attachment 1 -

Site Location Map



HIGHWAY 183

N

BUFFALO COMPRESSOR STATION
NE 1/4, NE 1/4, SEC.1, T 27N, R 23 W
HARPER COUNTY, OKLAHOMA

DIAGRAM IS FOR GENERAL LOCATION ONLY,
AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Attachment 2 -

Site Map

Appendix C

General Notice of Potential Liability and Offer to Negotiate for Removal Action

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

May 28, 2002

GENERAL NOTICE OF POTENTIAL LIABILITY AND OFFER TO NEGOTIATE FOR REMOVAL ACTION
URGENT LEGAL MATTER - PROMPT REPLY NECESSARY
CERTIFIED MAIL; RETURN RECEIPT REQUESTED

Mr. Nick Hetman
Williams South Central
3800 Frederica St.
Owensboro, KY 42301

Re: Williams Buffalo Compressor Station Superfund Site
Harper County, Oklahoma

Dear Mr. Hetman:

The purpose of this letter is to provide Williams Gas Pipelines Central, Incorporated (WGPC) with written notice of WGPC's potential liability at the Williams Buffalo Compressor Station Superfund Site (the Site), located in Harper County, Oklahoma. Information available to the U.S. Environmental Protection Agency (EPA) indicates that WGPC is the current owner of the Site. The air compressor system for the Buffalo Station is located in the building known as the auxiliary building. After the compressed air is produced, it is dried in an air dryer and passed through air lines to the air receiver storage tanks. Due to changes in temperature and pressure, condensate accumulated in the air dryer and air receiver storage tanks. In the past, condensate from the air dryer and air receiver tanks was directed to a drain line which fed into an underground drainage system.

WGPC conducted several Site Screening Investigations to determine whether PCBs had migrated from the air compressor units to the air line header, the engine room basement, or soil in the former air receiver area, the former air discharge area, the former pre lube air pipe area, and the backfilled impoundment. Soil samples were also collected from up gradient and down gradient locations, all on-site. The results of this investigation revealed PCB contamination was detected in the soils and sediments at the site. WGPC referred the site to EPA.

Although, WGPC notified EPA that there was an environmental hazard at the Site and the willingness to conduct and finance the removal action, under Superfund, specifically Sections 106 (a) and 107 (a) of CERCLA, EPA is required to inform WGPC as a current owner of the Site of WGPC's potential liability.

SITE RESPONSE ACTIVITIES

The response action, as described in the Action Memorandum signed May 20, 2002 (see Enclosure 1), will consist of the removal and offsite disposal of contained hazardous materials and contaminated soils presently identified on the Site and the initiation of a site characterization to determine whether additional contaminated soil areas remain.

INFORMATION TO ASSIST RESPONSIBLE PARTIES

To assist PRPs in preparing a proposal concerning this matter, EPA is providing the following information as Enclosures to this letter:

1. Action Memorandum (Enclosure 1)

2. Administrative Order on Consent (DRAFT) (Enclosure 2)

ADMINISTRATIVE RECORD

Pursuant to CERCLA Section 113(k), EPA must establish an administrative record that contains documents that form the basis of EPA's decision on the selection of a response action for a site. The administrative record files, which contain the documents related to the response action selected for this Site, will be made available to the public for inspection and comment. The primary location is the EPA Regional office at 1445 Ross Avenue, Dallas, Texas, 75202.

YOUR RESPONSE TO EPA

Please contact EPA Enforcement Officer, Mr. Kenneth Talton, at (214) 665-7475 or the address listed below within **seven (7) days of WGPC's receipt of this notice** to discuss this matter. WGPC's attorney may also contact EPA Attorney, Ms. Amy McGee, at (214) 665-8063 or the address listed below.

WGPC's oral and written responses should be forwarded to Mr. Kenneth Talton at the following telephone number and address:

Mr. Kenneth Talton
U.S. Environmental Protection Agency
Region 6
Superfund Cost Recovery Section (6SF-AC)
1445 Ross Avenue
Dallas, Texas 75202-2733
(214) 665-7475
FAX # (214) 665-6660
E-mail: talton.chuck@epa.gov

In WGPC's response, please also indicate an appropriate name, address, and telephone number for further contact.

Specific legal questions concerning this request should be directed to:

Ms. Amy McGee, Attorney
U.S. Environmental Protection Agency
Region 6
Office of Regional Counsel
Superfund Branch (6RC-S)
1445 Ross Avenue
Dallas, Texas 75202-2733
(214) 665-8063
FAX # (214) 665-6460
E-mail: mcgee.amy@epa.gov

We encourage WGPC to give this matter WGPC's immediate attention and request that WGPC provide a response within seven (7) calendar days of WGPC's receipt of this letter. Thank you in advance for WGPC's cooperation. We look forward to working closely with WGPC in the future.

Sincerely yours,

Myron O. Knudson, P.E.
Director
Superfund Division

Enclosures (2)

cc: Oklahoma Department
of Environmental Quality (ODEQ)

Appendix D

EPA Administrative Record (EPA File Only)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

ADMINISTRATIVE RECORD

REMOVAL ACTION

SITE NAME: BUFFALO COMPRESSOR STATION

BUFFALO, HARPER COUNTY, OKLAHOMA

SITE NUMBER: OK0000605396

VOLUME 1 OF III

Internet Address (URL) - http://www.epa.gov/earth1r6/
Recycled/Recyclable - Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

INTRODUCTION

The "Administrative Record" is the collection of documents which form the basis for the U.S. Environmental Protection Agency's (EPA) selection of a response action at a Superfund site. Superfund is the name given to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) which can be found in Title 42 of the U.S. Code (U.S.C.) at Sections 9601 through 9675. Response actions under Superfund can be either "removal action" or "remedial action". This Administrative Record involves a *removal action*. As EPA decides what to do at the site of a release of hazardous substances, EPA compiles documents concerning the site and EPA's decision into an "Administrative Record File." Documents may be added to the "Administrative Record File" from time to time. Once the EPA Regional Administrator or the Regional Administrator's delegate signs the Action Memorandum memorializing the selection of the removal action, the documents which form the basis for the selection of the removal action are known as the "Administrative Record."

The Administrative Record will be available for public review during normal business hours at EPA, Region 6 offices which is located at the address given below, and it will also be available at the Buffalo Public Library, 11 E. Turner Street, Buffalo, Oklahoma 73834. The Administrative Record is treated as a non-circulating reference document. Individuals may photocopy any documents contained in the Administrative Record File, according to the photocopying procedures at the EPA, Region 6 offices and at the repository located near the Site. The Administrative Record will be maintained at the local repository(s) until further notice. EPA may send additional documents to the repository (s) as work progresses at the Site

EPA may hold formal public comment periods at certain stages of the response process. The public is urged to use the formal public comment periods to submit written comments to EPA regarding the removal at the Site. However, EPA welcomes written comments at any time. Please send all comments to:

Removal Administrative Record Coordinator (6SF-R)
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

Except as explained below, this index and the record was compiled in accordance with EPA's Final Guidance on Administrative Records for Selecting CERCLA Response Actions, Office of

Internet Address (URL) - http://www.epa.gov/earth1r6/
Recycled/Recyclable - Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

Solid Waste and Emergency Response (OSWER) Directive Number 9833.3A-1 (December 3, 1990), and in accordance with Superfund Removal Procedures Public Participation Guidance for On-scene Coordinators: Community Relations and the Administrative Record, OSWER 9360.3-05 (July 1992), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300.

According to OSWER Directive No. 9833.3A-1, Page 37, each Region should maintain a compendium of guidance documents which are frequently used in selecting response actions, and the record located at or near the site of response action should contain an index to the compendium of response selection guidance documents. However, the EPA-headquarters generated compendium of guidance documents has not been updated since March 22, 1991 [see CERCLA Administrative Records: First Update of the Compendium of Documents Used for Selecting CERCLA Response Actions (March 1991)]. Moreover, the EPA, Region 6 Superfund Division Director has decided that developing and maintaining a compendium index in Region 6 would require extensive resources which are better utilized elsewhere in the Division. Accordingly, the Division Director has decided not to maintain an indexed compendium of response-selection guidance documents. Instead, consistent with 40 CFR Sections 300.805 (a) (2), 300.810 (a) (2), and OSWER Directive No. 9833.3A-1, Page 37, the Region has listed, in the Administrative Record Index (or in bibliographies of documents listed in the index), all guidance documents which may form a basis for the selection of this response action.. See *Section I* of the Administrative Record. Unless the guidance documents indexed were generated specifically for the Site, the guidance documents may not be physically present in the Administrative Record.

Documents listed as bibliographic sources for other documents in the record might not be listed separately in the Site Index. Where a document is listed in the Site Index but not located among the documents which EPA has made available in the repository, EPA will, upon request, include the document in the repository. This applies to verified sampling data, chain of custody forms, and guidance and policy documents. It does not apply to documents in EPA's "Confidential File". Requests for such documents should be addressed to the Removal Administrative Record Coordinator at the address listed above. Copies of guidance documents can also be obtained by calling the RCRA/Superfund/Title 3 Hotline at (800) 424-9346, or by accessing on your computer the US EPA Internet Home Page at: US EPA Headquarters, **http://www.epa.gov**. Then follow these instructions: click "Databases and Software"; click "General Information"; click "EPA's Information System Inventory (ISI)"; click "Index"; click "Enforcement" or "Superfund". Then, if you clicked "Enforcement", you will be on the "OECA" Page, where you will click "Policy & Guidance"; click "Statute Specific Policy Categories"; click "Site Remediation (Superfund)"; click on any of the listed "CERCLA (Superfund) Enforcement Documents" categories", including "Other Guidance and Documents," or you can click on "New Documents" for any recent policy additions. If you clicked on "Superfund" instead of "Enforcement", then click "Topics", or "Publications" and follow the menu.

COMMONLY USED ACRONYMS

ADPC&E	Arkansas Department of Pollution Control & Ecology
ATSDR	Agency for Toxic Substances and Disease Registry
CDC	Centers for Disease Control and Prevention
CERCLA	Comprehensive Environmental Response Compensation & Liability Act of 1980
EPA	United States Environmental Protection Agency
RPB	Response and Prevention Branch (formerly ERB)
ERRS	Emergency and Rapid Response Services [EPA Contractor] (Formerly ERCS)
FOIA	Freedom of Information Act
LDEQ	Louisiana Department of Environmental Quality
NFRAP	No Further Remedial Action Planned Summary
NMED	New Mexico Environment Department (formerly NMEID)
NPL	National Priorities List
OPA	Oil Pollution Act
OSC	On-Scene Coordinator
ODEQ	Oklahoma Department of Environmental Quality (formerly OSDH)
OSHA	Occupational Safety and Health Administration
POLREP	Pollution Report
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act of 1976
SARA	Superfund Amendment and Reauthorization Act of 1986
START	Superfund Technical Assessment and Response Team [EPA Contractor] (formerly TAT)
TNRCC	Texas Natural Resources Conservation Commission (formerly TWC)
UAO	Unilateral Administrative Order

ADMINISTRATIVE RECORD, HASTINGS RADIOCHEMICAL REMOVAL ACTION
SECTION I (GUIDANCE DOCUMENTS - NON SITE SPECIFIC)

DOCUMENT DATE	2/1/88
DOCUMENT TYPE	EPA Guidance Document
DOCUMENT	Superfund Removal Procedures, Revision 3, OSWER 9360.-3B
AUTHOR	EPA
DESCRIPTION	Superfund removal procedures (superceded in part by later guidance).

DOCUMENT DATE	4/1/90
DOCUMENT TYPE	EPA Guidance Document
DOCUMENT	Quality Assurance/Quality Control Guidance, OSWER 9360.4-01
AUTHOR	EPA
DESCRIPTION	Procedures for QA/QC for data collection activities and review of laboratory

DOCUMENT DATE	12/1/90
DOCUMENT TYPE	EPA Guidance Document
DOCUMENT	Action Memorandum Guidance, OSWER 9360.3-01
AUTHOR	EPA
DESCRIPTION	Outlines the minimum requirements for an action memorandum.

DOCUMENT DATE	12/3/90
DOCUMENT TYPE	EPA Guidance Document
DOCUMENT	Final Guidance on Administrative Records, OSWER 9833.3A-1
AUTHOR	EPA
DESCRIPTION	How to compile and establish administrative records under CERCLA.

DOCUMENT DATE	9/1/91
DOCUMENT TYPE	EPA Guidance Document
DOCUMENT	Guidance on the Consideration of ARARs, OSWER 9360.3-02
AUTHOR	EPA
DESCRIPTION	Potential Applicable or Relevant and Appropriate Requirements (ARARs).

ADMINISTRATIVE RECORD, HASTINGS RADIOCHEMICAL REMOVAL ACTION
SECTION I (GUIDANCE DOCUMENTS - NON SITE SPECIFIC)

DOCUMENT DATE	4/1/92
DOCUMENT TYPE	EPA Guidance Document
DOCUMENT	Removal Enforcement Guidance for OSCs, OSWER 9360.3-06
AUTHOR	EPA
DESCRIPTION	Summary of authorities for conducting enforcement activities during removals.

DOCUMENT DATE	7/1/92
DOCUMENT TYPE	EPA Guidance Document
DOCUMENT	Public Participation Guidance for OSCs, OSWER 9360.3-05
AUTHOR	EPA
DESCRIPTION	Removal action public participation and administrative record activities.

DOCUMENT DATE	8/1/93
DOCUMENT TYPE	EPA Guidance Document
DOCUMENT	Guidance on Conducting Non-Time-Critical Removal Actions, OSWER 9360.0-32
AUTHOR	EPA
DESCRIPTION	Non-time-critical removal actions and the National Contingency Plan.

DOCUMENT DATE	6/1/94
DOCUMENT TYPE	EPA Guidance Document
DOCUMENT	Removal Response Reporting: POLREPs and OSC Reports, OSWER 9360.3-03
AUTHOR	EPA
DESCRIPTION	Clarifies removal actions reporting criteria.

DOCUMENT DATE	9/1/96
DOCUMENT TYPE	EPA Guidance Document
DOCUMENT	Response Management: Start-up to Close-out, OSWER 9360.3-04
AUTHOR	EPA
DESCRIPTION	Summarizes guidance and statutory authorities for response management.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

ADMINISTRATIVE RECORD

REMOVAL ACTION

INDEX

May 31, 2002

SITE NAME: **BUFFALO COMPRESSOR STATION**

BUFFALO, HARPER COUNTY, OKLAHOMA

SITE NUMBER: **OK0000605396**

VOLUME 1 OF III

ADMINISTRATIVE RECORD, BUFFALO COMPRESSOR STATION SITE
REMOVAL ACTION INDEX:
SECTION 2 (SITE SPECIFIC DOCUMENTS)

FIRST PAGE	1
LAST PAGE	55
DOCUMENT DATE	December 2, 1994
DOCUMENT TYPE	Report w/ Attachments
DOCUMENT TITLE	PCB General Site Characterization. Former Buffalo Compressor Station
AUTHOR	Unspecified
AUTHOR'S COMPANY	ERM-Rocky Mountain, Inc.
RECIPIENT	Unspecified
RECIPIENT'S COMPANY	U.S. EPA, Region 6 *and* Williams Natural Gas Company
DESCRIPTION	PCB general site characterization with the following attachments:

0014-0015	Figure 1	Site Location Map
0016-0017	Figure 2	Site Diagram
0018-0019	Table 1	Relative Percent Difference Values
0020-0021	Table 2	Analytical Results
0022-0024	Appendix A	Site Photos
0025-0025	Appendix B	Waste Disposal Documents (None)
0026-0055	Appendix C	Analytical Reports

May 31, 2002

ADMINISTRATIVE RECORD, BUFFALO COMPRESSOR STATION SITE
REMOVAL ACTION INDEX:
SECTION 2 (SITE SPECIFIC DOCUMENTS)

FIRST PAGE	56
LAST PAGE	86
DOCUMENT DATE	April 6, 1995
DOCUMENT TYPE	Report w/ Attachments
DOCUMENT TITLE	PCB Site Characterization, Williams Natural Gas Facility, Project No. 11885
AUTHOR	Unspecified
AUTHOR'S COMPANY	Burlington Environmental, Inc., *A Philip Environmental Company*
RECIPIENT	Unspecified
RECIPIENT'S COMPANY	U.S. EPA, Region 6 *and* Williams Natural Gas
DESCRIPTION	PCB Site Characterization with following attachments:

0062-0065	Figures	Maps/Diagrams/Drawings
0066-0068	Tables:	PCB Analytical Results for Concrete Wipe Samples
0069-0078	Appendix A.	Sample Logs/Chain of Custody Documentation
0079-0083	Appendix B.	ETS Analytical Results
0084-0086	Appendix C	Manifests and Certificates of Disposal

May 31, 2002

ADMINISTRATIVE RECORD, BUFFALO COMPRESSOR STATION SITE
REMOVAL ACTION INDEX:
SECTION 2 (SITE SPECIFIC DOCUMENTS)

FIRST PAGE	87
LAST PAGE	458
DOCUMENT DATE	April 23, 2001
DOCUMENT TYPE	Report w/ Attachments
DOCUMENT TITLE	PCB Site Characterization, Buffalo Compressor Station, Buffalo, OK, NE 1/4, NE 1/4, Sec. 1, T27N, R23W, Harper County. Project No. 50007055.
AUTHOR/s	John R. Rockhold, P.G., CGWP, Senior Project Manager *and* Michael S. Kukuk, P.G., Associate Principal
AUTHOR'S COMPANY	Terracon
RECIPIENT	Mark Sullivan
RECIPIENT'S COMPANY	Williams Gas Pipelines South Central *and* U.S. EPA, Region 6
DESCRIPTION	Final Emergency Response Report describing the U.S. EPA's response actions at the Service Waste, Inc., fire site with attachments:

0109-0110	Appendix A:	Figure 1. Site Vicinity Map
0111-0111		Figure 2. Site Diagram
0112-0112		Figure 3. Impoundment Area Grid - PCB Results
0113-0113		Figure 4. Air Receiver Discharge Area Grid
0114-0114		Figure 5. Impoundment Area Grid - PCB Results
0115-0119	Appendix B:	Table 1. PCB Analytical Results
0120-0120		Table 2. RCRA Metal Analysis Soils (11-20-2000)
0121-0122		Table 3. SVOC Analysis Soils (11-2000)
0123-0125	Appendix C:	Standard Operating Procedures
0126-0128	Appendix D:	Photo Log
0129-0354	Appendix E:	Laboratory Reports
0355-0361	Appendix F:	Final Report and Letter from Williams to EPA Region V1 (3-10-95) w/ Attachments:
0362-0370	Figures	Maps/Drawings/Diagrams
0371-0379	Tables	Table A - Tables 1 thru 7
0380-0458	Appendices:	Reports/Analytical Reports

May 31, 2002

ADMINISTRATIVE RECORD, BUFFALO COMPRESSOR STATION SITE
REMOVAL ACTION INDEX
SECTION 2 (SITE SPECIFIC DOCUMENTS)

FIRST PAGE:	459
LAST PAGE:	473
DOCUMENT DATE:	May 20, 2002
DOCUMENT TYPE:	Removal Action Memorandum w/ Attachments
DOCUMENT TITLE:	Request for a Time Critical Removal Action at the Buffalo Compressor Station Site, Harper County, Oklahoma
AUTHOR:	Rita Engblom, Federal OSC (On-Scene Coordinator)
AUTHOR'S COMPANY:	U.S. EPA, Region 6
RECIPIENT:	Myron O. Knudson, P.E., Director
RECIPIENT'S COMPANY:	U.S. EPA, Region 6
DESCRIPTION:	Request and documents for a Removal Action at Buffalo Compressor Station Site. Attachments are as follows:

0471-0471	Attachment 1	Site Location Map
0472-0742	Attachment 2	Site Map
0473-0473	Attachment 3	Enforcement Attachment has been withheld as Enforcement Sensitive and is located only in separate confidential files at U.S. EPA, Region 6

May 31, 2002

Appendix E

Pollution Report (POLREP)

Date: August 22, 2002
Subject: Buffalo Compressor Station, Buffalo, Harper County, Oklahoma
From: Rita Engblom, OSC, U.S. EPA, Region 6, 214-665-8341
To: Director, OERR
Charles A. Gazda, Chief, RPB, EPA Region 6
Director, Oklahoma Department of Environmental Quality

POLREP No. 1 (Initial)

Event: Removal Action - Enforcement
Site ID Nos. NA
CERCLIS: OK0000605396
Start Date: July 18, 2002
Demobilization Date:
Completion Date:
Site Type: Pipeline Compressor Station
Site Latitude/Longitude: N 36.85328° W 99.62039°

I. SITUATION

The Buffalo Compressor Station site is currently owned by Williams Gas Pipelines Central, Inc., f/k/a Williams Natural Gas Company (WGPC) and located approximately one mile northeast of Buffalo, Harper County, Oklahoma. WGPC is the responsible party. The site is not in service and currently consists of building foundations and concrete pads from the former engine room and auxiliary building, engine room basement, piping in the former air receiver area, and the fin fans area. The site is located on approximately 18-acres of open pastureland. Neighboring properties are primarily used for agricultural purposes. The nearest navigable waterway to the site is a tributary of Buffalo Creek which is located approximately one-quarter of a mile east of the site.

Prior to the early 1970s, the site served as a high-pressure natural gas pipeline transmission and distribution system to maintain necessary gas pressures. During the operational years of the site, polychlorinated biphenyls (PCBs) were used in lubricants and cooling fluids at the compressor station. PCB-contaminated lubricants may have migrated from the air compressor units to the air dryers and air receiver tanks as PCB-contaminated condensates. During the 1980s, WGPC removed above ground site structures. During April 1994 through March 2002, WGPC conducted multiple site screening investigations through the collection of wipe and soil samples at the site to determine whether PCB-contaminated lubricants had been released or provided a threat of release into the environment. As a result of the WGPC investigations, four potential areas were identified to contain PCB contamination. The areas of concern include the impoundment area (approximately 1,215 cubic yards of PCB-contaminated soil), air lines (approximately 200 feet of underground piping associated with the air system), drain lines (approximately 400 feet of piping associated with discharge to the impoundment), and the air receiver area (approximately 30 cubic yards of PCB-contaminated soil). In 1995, WGPC performed concrete cleaning and removed PCB-contaminated piping located inside the auxiliary building. Verification wipe samples were collected to ensure target areas were cleaned

to below the PCB clean-up level for non-porous surfaces in high occupancy areas, 10 ug/100 cm^2.

On May 20, 2002, EPA signed an Action Memorandum requesting a time critical removal action at the Buffalo Compressor Station site. On May 28, 2002, EPA submitted a general notice of potential liability and offer to negotiate for removal action to WGPC. On July 18, 2002, EPA and WGPC entered into an Administrative Order on Consent for a Removal Action at the site to address the following sources of PCB-contamination:

- Impoundment-- Excavate all PCB contaminated soils within the impoundment area that are above the cleanup standard of 1 mg/kg or to less than 10.0 mg/kg with construction of a cap in accordance with 40 CFR § 761.61(a)(7) and (a)(8).

- Drain Line and Air Line Piping-- The drain line to the impoundment and the underground air lines in the air receiver or auxiliary building areas exhibiting surface PCB concentrations in excess of 10 μg/100 cm^2 shall be removed.

- Air Compressor Area-- Excavate all PCB contaminated soils from the air compressor area that are above the cleanup standard of 1 mg/kg or to less than 10.0 mg/kg with a cap meeting the requirements of 40 CFR § 761.61(a)(7) and (a)(8).

II. ACTIONS TAKEN

On August 20, 2002, WGPC and their contractors mobilized on-site and commenced removal activities. At the site were three contractors for WGPC: Diamond Services (tasked to expose underground piping and excavating contaminated soils), MP Environmental (tasked to transport the PCB-contaminated soils), and Atkins Benham Group (tasked to collect confirmation samples and documentation of on-site field activities). On August 21, 2002, EPA mobilized to the site and coordinated with a WGPC representative.

From August 20 - 21, 2002, WGPC identified and exposed drain and air lines, established grid nodes using a surveying instrument in the impoundment area, and shipped PCB-contaminated pipelines and soils for disposal. As of close of business, on August 21, 2002, 59 truck loads (approximately 1,062 cubic yards) were transported and disposed of at the Safety Kleen - Lone and Grassy Mountain facility in Waynoka, Oklahoma, approximately 80 miles southwest of the site. WGPC collected both wipe and soil samples for confirmation purposes and submitted the field samples to a lab for PCB analysis. WGPC collected a composite and split soil sample of the bottom of a concrete sump located due west of the air receiver area. A wipe sample was collected from the interior wall of the concrete sump. The 4 x 4 square foot concrete sump was broken up and disposed of as PCB-contaminated waste with the PCB-contaminated soils. A wipe sample was collected at the 4-inch drain line located near the southeast corner of the compressor pad. Three composite soil samples were collected on the north and south wall, west and east wall, and floor area of the excavated air receiving area.

III. FUTURE PLANS

Excavation of PCB-contaminated soil at the impoundment area is expected to be completed on August 22, 2002. WGPC will collect confirmation soil samples from within the impoundment area. Sample results for the samples collected August 20 - 21 will be available by August 23, 2002. WGPC will secure the excavation area and await sample result analysis before backfilling the impoundment area. The clean-up standard for PCB-contaminated soils are 1 mg/kg or to less than 10 mg/kg with construction of a cap in accordance with 40 CFR Section 761.61(a)(7) and (a)(8).

IV. KEY ISSUES

None.

ATTACHMENTS

Buffalo WP fig 2.pdf - Site Sketch
overall view.jpg - 180 degree panoramic of site facing east to west
impoundment area.jpg - 3 shot panoramic of impoundment area facing south to west

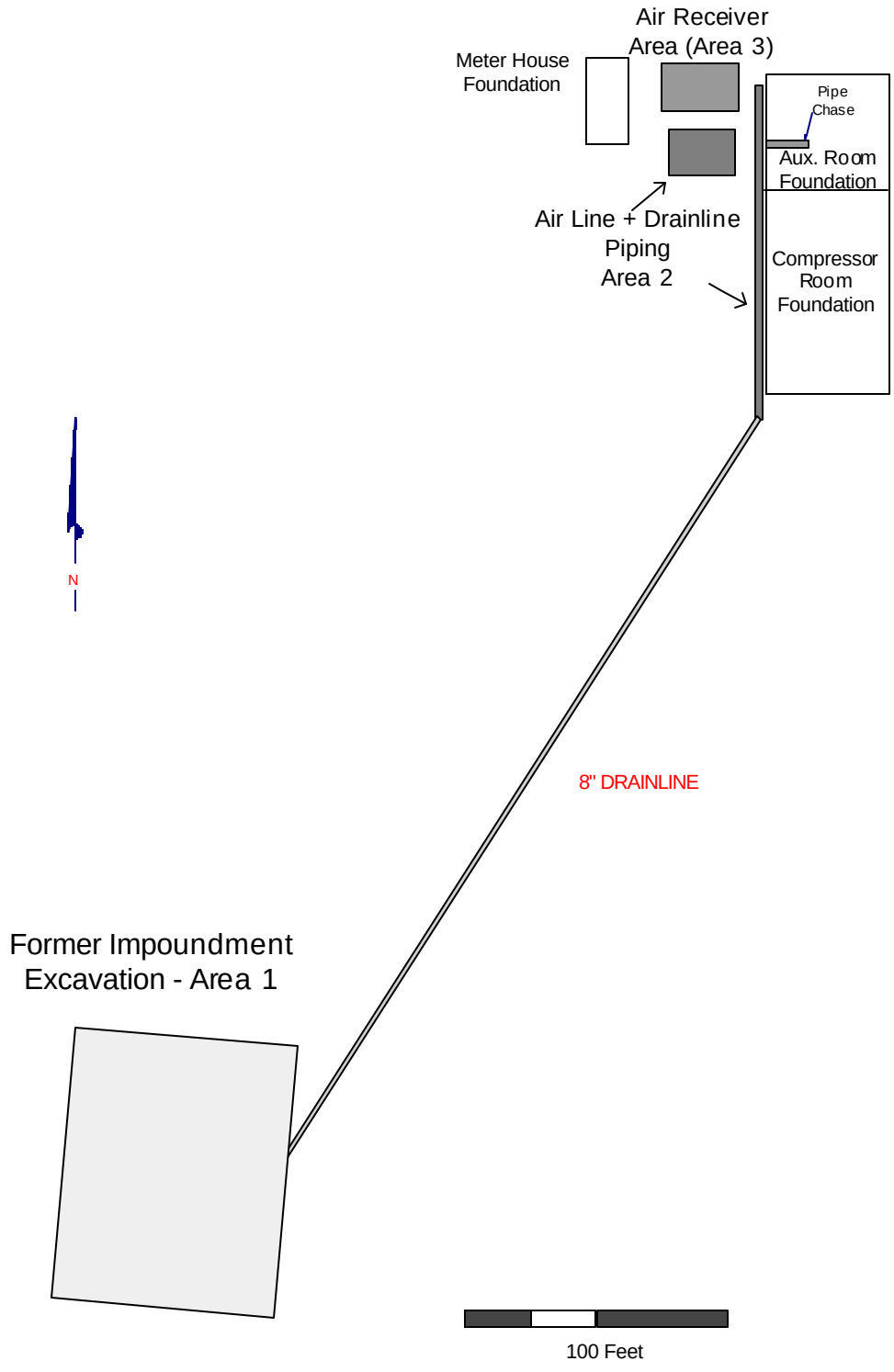


Figure 2 - Site Layout and Work Areas

	CALC BY: / FIELD BY: / DRAWN BY: / REPD:	
	SCALE: NTS	
	DATE:	
	JOB NO.	


CAT

Date: September 6, 2002
Subject: Buffalo Compressor Station, Buffalo, Harper County, Oklahoma
From: Rita Engblom, OSC, U.S. EPA, Region 6, 214-665-8341
To: Director, OERR
Charles A. Gazda, Chief, RPB, EPA Region 6
Director, Oklahoma Department of Environmental Quality

POLREP No. 2 and Final

Event: Removal Action - Enforcement
Site ID Nos. NA
CERCLIS: OK0000605396
Start Date: July 18, 2002
Demobilization Date: August 29, 2002
Completion Date: August 29, 2002
Site Type: Pipeline Compressor Station
Site Latitude/Longitude: N 36.85328° W 99.62039°

I. SITUATION

The Buffalo Compressor Station site is currently owned by Williams Gas Pipelines Central, Inc., f/k/a Williams Natural Gas Company (WGPC) and located approximately one mile northeast of Buffalo, Harper County, Oklahoma. WGPC is the responsible party. The site is not in service and currently consists of building foundations and concrete pads from the former engine room and auxiliary building, engine room basement, piping in the former air receiver area, and the fin fans area. The site is located on approximately 18-acres of open pastureland. Neighboring properties are primarily used for agricultural purposes. The nearest navigable waterway to the site is a tributary of Buffalo Creek which is located approximately one-quarter of a mile east of the site.

For additional information *See* Polrep #1.

II. ACTIONS TAKEN

On August 22 - 23, 2002, WGPC contractors continued excavation and transportation activities. A total of 82 truck loads (approximately 1,476 cubic yards) of PCB-contaminated pipelines and soils were transported and disposed of at the Safety Kleen - Lone and Grassy Mountain facility in Waynoka, Oklahoma, approximately 80 miles southwest of the site. WGPC utilized a portable gas chromatography (GC) instrument to screen excavated soils in the impoundment for PCBs. WGPC collected confirmation soil samples from the bottom floor and side walls of the excavated impoundment area and submitted three composite soil samples to Environmental Science Corp. in Nashville, Tennessee for PCB analysis.

Field activities were suspended on August 24 and 25, 2002.

On August 26, 2002, WGPC received analytical results on the confirmation soil samples over the phone. All three soil samples were non-detect for PCB contamination. From August 26 - 28, 2002, WGPC backfilled and compacted soils in the impoundment area. On August 29, 2002, WGPC and contractors completed field activities and demobilized the site.

III. FUTURE PLANS

Based on the terms and conditions of the Administrative Order on Consent for a Removal Action, WPGC will submit a final report within 120 days from the demobilization date of August 29, 2002 to the EPA for review.

IV. KEY ISSUES

None.

ATTACHMENTS

Buffalo excavation.wpg

Appendix F

Digital Photographs


CAT

Appendix G

Copy of START-2 Logbook

"Outdoor writing products for outdoor writing people."

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All-Weather Notebook
No. 391

Buffalo Compressor
Buffalo, Harper Co., Oklahoma
TDD 06-02-07-0003
WO # 12632.001.040.0239.01

4 5/8" x 7" - 48 Numbered Pages

"Rite in the Rain"®
ALL-WEATHER WRITING PAPER

Name Buffalo Compressor

Address Buffalo, Harper Co., Oklahoma
N 36.85328° W 99.62039°

Phone

Project TDD 06-02-07-0003
WO# 12632.001.040.0293.01

Clear Vinyl Protective Slipcovers (Item No. 30) are available for this style of notebook. Helps protect your notebook from wear & tear. Contact your dealer or the J. L. Darling Corporation.

2705

CONTENTS

PAGE	REFERENCE	DATE
	Waypant 001 Entry N 36.85328° W99.62039°	
	913 310 7625 cell	
	MP Environmental trucking	
	Buffalo*Waynoka, OK 75-80miles	
	Safety Klean hired MP Enviro.	
	Haz Waste PCB class 9 NA 2315	
	started yesterday - 8/20/02	
	Diamond Services - excavating	
	End dumps	
	PRP Mark Sullivan (913) 515-1460 cell	
	EPA Ken Talton (469) 363-0726 cell	

NA Buffalo Compressor 06-02-07-0003

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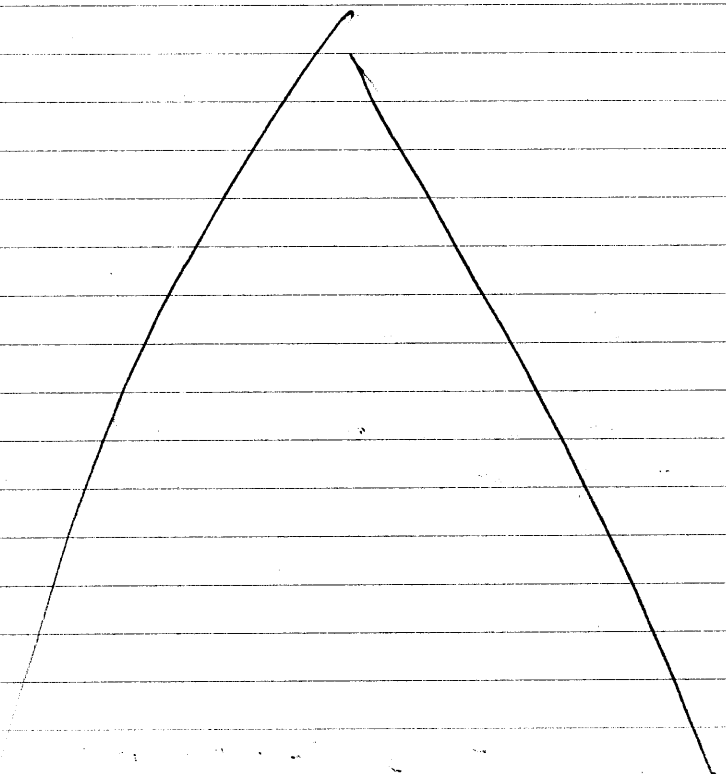
Patty Kulow



8/21/02 Buffalo Compressor 06-02-07-0003

0400 START Kulow departs to Houston Hobby Airport.

0600 START departs Houston to Oklahoma City, Ok

0715 START arrives in OK City and rents economy vehicle and mobilizes to Buffalo, Ok. Heavy traffic and heavy rain is noted.

1145 START attempted to contact EPA Enforcement Officer Ken Talton and PRP Mark Sullivan but no answer. START arrives on-site and observes 3 ~~roll-off boxes~~ end dump trucks on-site. START maps site location using a handheld GPS unit Garmin III Plus. Waypoint 001 = N 36.85328° W 99.62039°, GPS RFW # 24788.

1150 START coordinates with MP Environmental Trucking co representative, who informs START of the following:

- EPA rep, Safety Kleen, + PRP departed site for lunch.
- PRP Mark Sullivan (913) 310-7625 cell
- Excavation activities began yesterday
- MP Environmental on-site yesterday at 1000 hours and began transporting PCB contaminated soils to Safety Kleen in Waynoka, OK (approx. 80 miles from Buffalo, Ok).

Patty Kulow 8/21/02

8/21/02 Buffalo Compressor 06-02-07-0003

Cont. - Waste disposed of on Haz Waste. (Clean Harbors in Waynoka)
- Diamond Services is conducting the excavation. PK

1205 START departs site for lunch. PK

1245 START arrives on-site and coordinates with Mark Sullivan - Williams Gas Pipelines Central - Environ. Specialist. PK
- Diamond Services - excavation activities. Began yesterday @ 10am. PK
- Bruce McKenzie - works for Atkins Benson - documentation for Diamond Svcs. PK
- will be collecting samples and analyze for PCB Atkins will be doing screening using GC instrument. PK
- 8' concrete sump was excavated and disposed of yesterday to Safety Klean in Waynoka as Haz Waste. Dimensions 4x4x4 - good condition no breathes. START photodocuments sump 001.
- Yr ago - Williams conducted geoprobe sampling at 10', At depth greater than 5' avg readings were 2-5 ppm range. PK
- Source of PCB were the air compressors. PK

1320 EPA Ken Talton arrived on-site and coordinates with START, PRP, + Atkins rep. PRP display sketches.

Patty Falon 8/21/02

8/21/02 Buffalo Compressor 06-02-07-0003

- excavation includes 2" line from basement. PK
- 1995 - Williams cleaned areas inside basement of former engine room. PK
- START photodocuments air lines (source). This facility was reclaimed in 1980s - never had air lines cleaned.
- Air receiver tank ~~4pt grid~~ soil samples collected 4pt comp on bottom, NWES sample locations collected at bottom + sides of excavation. See photo #3. Results will be ready Friday afternoon.
- 3 routes: ① via ~~pd~~ oil/PCB in sump concrete
② through wtr drain of air tanks
③ air stream, piping that drives compressor.

3/4" steel from air lines then 2" from concrete sump then 4" from SE corner of compressor pad

1345 START photodocuments overall view of site.
- Valve from compressor pad will be sampled via a wipe. Results will be ready Friday. Lab is Environmental Science Corp. ESE primary lab and splits to Test America both in Nashville, TN. ~~4 sump~~ PK
- Monday was mobilization day - collected 1 backfill soil - ND for PCB, Dirtyard is near woodward, OK Diamond Svcs exposed ~~excavated~~ pipelines.

Patty Falon 8/21/02

8/21/02 Buffalo Compressor 06-02-07-0003

Tuesday - began excavating soil at impoundment area and transported for disposal. Discovered concrete sump which contained black dirt. One split and field sample from bottom of sump (composite) collected. And 1 wipe sample from interior wall of sump.

1350 EPA Tatton departs site for the day.

- Cont. Tuesday - broke up concrete sump and disposed of at Lone Mtn.

- Wednesday - collected one wipe sample at 4" line valve (SE of compressor pad.) Also collected 4 grab/composite of floor and N + S composite = 1 wall, + W + E composite = 1 wall area called air receiving area.

Summary of daily events: Mon - make to site, expose drain/air line piping, set up grid nodes using Total Station.

Tues: Began excavation of impoundment area cut pipe, wrapped both ends, cont. exposing pipe, stockpiled pipe, discovered 2" line b/c couldn't pull 4" pipe anymore. 2" line runs to basement. EPA Health Based Screening Level for PCB in soil is 10ppm.

Wed: traced out 2" line to basement entered from basement, excavating soils + transport

Patty Fitzlow 8/21/02

8/21/02 Buffalo Compressor 06-02-07-0003

Lng. Lone Mtn - Safety Kleen Waste Facility close at 3:30pm. Work hours 7am - 7pm

START Kulow coordinates with Diamond Svcs. Danny Larkey - Proj Mgr/H+S officer. Larkey states that 24 loads (end dump trucks) were transported yesterday. today 24 loads were transported for the day.

1425 Atkins Bruce McKenzie departs site to FED-EX Samples collected for the day.

1430 START photodocuments excavation area of impoundment. See photolog on pg 45.

1440 START uses GPS unit to sketch structures of site. Distance from site entrance gate to SE corner of impoundment is ~ 510 ft due west of gate

- SE corner = 002 N 36.85364° W 99.62208°
- SW corner = 003 N 36.85364° W 99.62207° approx 85' due west of 002.
- entry to impoundment = 004 N 36.85388° W 99.62207° approx 185' due N of 005.
- intersection of 2" line to 4" line = 005 N 36.85431° W 99.62172°.
- intersection due 2" line goes to the N = 006 ~ 130' due east of 005 N. 36.85431° W 99.62126°
- SE corner of engine room = 007 N 36.85461' W 99.62126° ~ 110' due north of 006.

Patty Fitzlow 8/21/02

8/21/02 Buffalo Compressor 06-02-07-0003

Cont NE corner of engine room = 008 ——— PR

N 36.85490° W 99.62135° ~ 110' North of 007.

- North fence gate = 009 N 36.85490° W 99.62099° ~ 250' due ~~east~~ of 008. ——— PR

- NW corner of structure, near concrete sump = 010

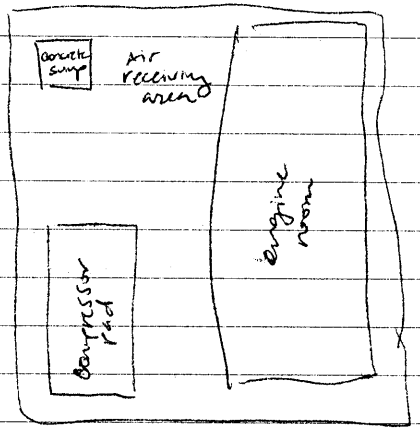
N 36.85491° W 99.62180° ~ 135' due west of 009.

- SW corner of structure, near compressor pad = 011

N 36.85456° W 99.62182° ~ 125' due south of 010

~ 110' due SSE to 005 4" + 2" intersection. ——— ⊙

Rough Sketch: ———— ⊙



~ 260' due South

impoundment

——— 8/21/02

8/21/02 Buffalo Compressor 06-02-07-0003

1520 START coordinates with PRP ~~Sco~~ regarding future plans: ① Fill in basement with backfill dirt and burn concrete - piping to be removed. ——— PR

② conduct site assessment as per Williams, may be next year. ③ ~~FERC~~ FERC Fed. Energy Resource Commission will conduct final reclaim of property ④ Sell land. ——— PR

- Expect to be done by tomorrow afternoon. ——— ⊙

Anticipated 65-75 truck loads total. ——— PR

1525 PRP to remove 2" line and move to impoundment area to cut up. By today may be done with all drain line piping (exposing / excavating). ⊙

1535 START ~~K~~ knows completes rough sketch and departs site. PRP remains on site to cut pipe and excavate soils. ——— PR

1540 START contacts OSC Engblom and provides an update of on site activities. OSC requests POLREP 01.

1639 START arrives at hotel in Woodward, OK. ⊙

~~1830~~ 1930 START begins ~~general~~ POLREP 01. ——— ⊙

2220 START photostiches photos. Photos used in POLREP = overall view.jpg, 002.jpg, impoundment.jpg, 013.jpg, ——— ⊙

~~2245~~ 2300 START submits POLREP to OSC Engblom via email and ceases work activities for the day. ——— ⊙

——— 8/21/02

8/22/02 Buffalo Compressor 06-02-07-0003

0715 START coordinates with Atkins McKenzie for site update at the Hotel in Woodward. McKenzie stated that work has already mobilized to the site. Yesterday, additional trucks transported a total of 35 loads for disposal. As of 8/21/02 COB - 59 loads have been transported. 1 Load = 18 cu yds of soil. Today's activities include backfill activities at drain/air lines, excavation activities at impoundment, continued transportation activities. PK

0730 START mobilizes to Oklahoma City. CO

1030 START arrives at OK City Airport and departs to Dallas Love Field at 1150 hrs. Hours charged from ~~1208~~ 1300 - 1930 will be for the Hudson Event TDD. START to meet w/ OSC Englebom to discuss booth ideas for Hudson Event project.

1130 Flight 1477 to DAL Love has been delayed. Flight to depart @ 1245 and arrive into DAL Love @ 1:36 pm. START left message with Rita Englebom. PK

Patty Fulcher 8/22/02

8/29/02 Buffalo Compressor 06-02-07-0003

START contacted Bruce McKenzie of Atkins Benham (WGPC) via phone for current project status. McKenzie informed START of the following:

8/21/02 WEDS site - Aqua Terra Environmental Solutions, Inc of Kansas mobilized ~~on-site~~ a portable GC unit and screened excavated soils in the impoundment area. ~~Same~~ Grab samples screened at 20 ppm or below, typically ~~were~~ are non detect in laboratory setting

8/22/02 THURS - Excavation + Transportation activities continued. A total of 82 trucks (~1476 cu yds) were transported off-site. 80 trucks contain soil and 2 trucks contained ~1408' of PCB affected pipelines (air/drain lines). Confirmation soil samples were collected at the bottom floor, S + W side walls, and N + E side walls of the ~~exc~~ impoundment area, for a total of 3 composite soil samples. Samples were submitted to Environmental Science Corp laboratory in Nashville, TN for PCB analysis. CO

8/23/02 FRI - Excavation of sluff material were excavated - 3 trucks of sluff were transported off-site to Lone + Grassy Mon 1 of the 3 trucks contained ~~discontamo~~

Patty Fulcher 8/29/02

8/29/02 Buffalo compressor 0602-07-0003 ~~Air~~ water used to decontaminate the backhoe. Also an ~~equipment~~ sample (WIPE) was collected from the backhoe bucket after it was decontaminated. The wipe sample was sent to ESE for PCB analysis. ——— PK

8/24-25/2002 - Sat/Sun - Field activities were suspended for the weekend. ——— PK

8/26/02 - MON - PRP received lab analytical results of confirmation samples via phone. All 3 soil samples were ND for PCB. Backfill operations commenced. ——— PK

8/27/02 - Backfill operations continued.

8/28/02 - WEDS - Backfill operations complete. ——— PK

8/29/02 - THURS - All contractors + PRP demobilized the site. ——— PK

McKenzie informs that PRP has 120 days to complete the final report and submit to the EPA for review and approval. — PK

START updates OSC Englbom over the phone. OSC tasks START to generate ROUTER 02 and FINAL. ——— PK

Patty Tulow 8/29/02

end of logbook page 1 - 12
see pg 45 for photo documentation
9/23/02
Patty Tulow

Appendix H

Copy of START-2 TDD 06-02-07-0003

EPA

U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

START2
Technical Direction Document

Roy F. Weston

TDD: 06-02-07-0003
Contract: 68-W-01-005

TDD - Signed by Cora Stanley/R6/USEPA/US on 07/17/2002 10:39:07 AM, according to Cheng Wei Feng/start6/rfw-start/us

Purpose: Work Assignment Initiation
Priority: High
Overtime: Yes
Project/Site Name: Buffalo Compressor Station Site
County: Harper
City, State Zip: Buffalo, OK
SSID: MN **CERCLIS:** OK0000605396

Period: Base Period
Start Date:07/29/2002
Completion Date:10/30/2002
WorkArea: RESPONSE ACTIVITIES
Activity: Potentially Responsible Parties Removal Actions
Section of SOW: II.B.5
Performance Based: No

Authorized TDD Ceiling:	Cost/Fee	LOE
Previous Action(s):	$0.00	0.0
This Action:	$13,150.00	200.0
New Total:	$13,150.00	200.0

Specific Elements More specifically the contractor shall, - Analyze PRP response documents and actions, - Analyze the accuracy timeliness and completeness of PRP reports

Description of Work:

This TDD is under work assignment number 0040.

START shall:

1. Review existing site documentation as provided by OSC.
2. Two (2) START employees shall conduct site visit on July 30, 2002.
3. No Cad Drawings are needed - all drawing maps already provided by PRP and will be provided to START by EPA.
4. Provide Digital photodocumentation.
5. Coordinate with State and local agencies,

Accounting and Appropriation Information

SFO: 22

Line	DCN	IFMS	Budget/ FY	Appropriation Code	Budget Org Code	Program Element	Object Class	Site Project	Cost Org Code	Amount
1	SCR001	AAA	01	T	6AS0P	50102D	2505	06MNBB00	-	$13,150.00

Funding Summary:	Funding
Previous:	$0.00
This Action:	$13,150.00
Total:	$13,150.00

Funding Category
CERCLA Pipeline

Task Monitor Section

- Signed by Rita Engblom/R6/USEPA/US on 07/10/2002 09:30:23 AM, according to Cheng Wei Feng/start6

Task Monitor: Rita Engblom **Date:** 07/10/2002

Project Officer Section - Signed by Henry Thompson/R6/USEPA/US on 07/17/2002 08:49:41 AM, according to Ch

PO Comments: APO Hank Thompson for PO Linda Carter
Project Officer: Henry Thompson **Date:** 07/17/2002

Contracting Officer Section - Signed by Cora Stanley/R6/USEPA/US on 07/17/2002 10:39:07 AM, according to Ch

Contracting Officer: Cora Stanley **Date:** 07/17/2002

Contractor Section - Signed by Robert Beck/start6/rfw-start/us on 07/18/2002 08:57:45 AM, according to

EPA

U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

START2
Technical Direction Document

Roy F. Weston

TDD: 06-02-07-0003
Amendment: A
Contract: 68-W-01-005

TDD - Signed by Cora Stanley/R6/USEPA/US on 07/23/2002 08:54:10 AM, according to Cheng Wei Feng/start6/rfw-start/us

Purpose: Work Assignment Initiation

Period: Base Period
Start Date:07/23/2002
Completion Date:10/30/2002

Project/Site Name: Buffalo Compressor Station Site
County: Harper
City, State Zip: Buffalo, OK
SSID: MN **CERCLIS:** OK0000605396

WorkArea: RESPONSE ACTIVITIES
Activity: Potentially Responsible Parties Removal Actions
Activity Code: BB
Section of SOW: II.B.5
Performance Based: No

Authorized TDD Ceiling:	Cost/Fee	LOE
Previous Action(s):	$13,150.00	200.0
This Action:	$0.00	0.0
New Total:	$13,150.00	200.0

Specific Elements
Description of Work:

This TDD is under work assignment number 0040.

Amendment "A" amends the start date to reflect July 23, 2002 in lieu of July 29, 2002. This date change allows contractor time to develop health and safety plan for site visit.

START shall:
1. Review existing site documentation as provided by OSC.
2. Two (2) START employees shall conduct site visit on July 30, 2002.
3. No Cad Drawings are needed - all drawing maps already provided by PRP and will be provided to START by EPA.
4. Provide Digital photodocumentation.
5. Coordinate with State and local agencies,

Accounting and Appropriation Information

SFO: 22

Line	DCN	IFMS	Budget/ FY	Appropriation Code	Budget Org Code	Program Element	Object Class	Site Project	Cost Org Code	Amount
1	SCR001	AAA	01	T	6AS0P	50102D	2505	06MNBB00	-	$0.00

Funding Summary:	Funding
Previous:	$13,150.00
This Action:	$0.00
Total:	$13,150.00

Funding Category
CERCLA Pipeline

Task Monitor Section

Task Monitor: Rita Engblom **Date:** 07/22/2002

**Project Officer Section - Signed by Linda Carter/R6/USEPA/US on 07/22/2002 02:22:31 PM, according to Cheng **

PO Comments: Amendment issued after discussion with TM's Team Leader, Jim Staves.

Project Officer: Linda Carter **Date:** 07/22/2002

Contracting Officer Section - Signed by Cora Stanley/R6/USEPA/US on 07/23/2002 08:54:10 AM, according to Ch

Contracting Officer: Cora Stanley **Date:** 07/23/2002

Contractor Section

EPA
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

START2
Technical Direction Document

Weston Solutions; Inc.

TDD: 06-02-07-0003
Amendment: B
Contract: 68-W-01-005

TDD - Signed by Tobin Osterberg/R6/USEPA/US on 09/30/2002 10:20:35 AM, according to Jeff Criner/start6/rfw-start/us

Purpose: Work Assignment Initiation

Period: Base Period
Start Date:07/23/2002
Completion Date:12/30/2002

Project/Site Name: Buffalo Compressor Station Site
County: Harper
City, State Zip: Buffalo, OK
SSID: MN **CERCLIS:** OK0000605396

WorkArea: RESPONSE ACTIVITIES
Activity: Potentially Responsible Parties Removal Actions
Activity Code: BB
Performance Based: No

Authorized TDD Ceiling:	Cost/Fee	LOE
Previous Action(s):	$13,150.00	200.0
This Action:	$0.00	0.0
New Total:	$13,150.00	200.0

Specific Elements
Description of Work:

This TDD is under work assignment number 0040.

Amendment B extends the completion date to 12/30/02. The completion date is extended to await the completion of the final report from Williams in compliance with the AOC. The PRP document shall be included in the final report. No additional funding or LOE is required at this time.

Amendment "A" amends the start date to reflect July 23, 2002 in lieu of July 29, 2002. This date change allows contractor time to develop health and safety plan for site visit.

START shall:
1. Review existing site documentation as provided by OSC.
2. Two (2) START employees shall conduct site visit on July 30, 2002.
3. No Cad Drawings are needed - all drawing maps already provided by PRP and will be provided to START by EPA.
4. Provide Digital photodocumentation.
5. Coordinate with State and local agencies,

Accounting and Appropriation Information

SFO: 22

Line	DCN	IFMS	Budget/ FY	Appropriation Code	Budget Org Code	Program Element	Object Class	Site Project	Cost Org Code	Amount
1	SCR001	AAA	01	T	6AS0P	50102D	2505	06MNBB00	-	$0.00

Funding Summary:	Funding
Previous:	$13,150.00
This Action:	$0.00
Total:	$13,150.00

Funding Category
CERCLA Pipeline

Task Monitor Section
- Signed by Rita Engblom/R6/USEPA/US on 09/25/2002 10:30:31 AM, according to Jeff Criner/start6/rfw
Task Monitor: Rita Engblom **Date:** 09/25/2002
Project Officer Section - Signed by Rena McClurg/R6/USEPA/US on 09/27/2002 05:48:20 PM, according to Jeff Crin
Project Officer: Rena McClurg **Date:** 09/27/2002
Contracting Officer Section - Signed by Tobin Osterberg/R6/USEPA/US on 09/30/2002 10:20:35 AM, according to J
Contracting Officer: Tobin Osterberg **Date:** 09/30/2002
Contractor Section - Signed by Robert Beck/start6/rfw-start/us on 10/01/2002 02:15:19 PM, according to